

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PRINTFLY CORPORATION	:	CIVIL ACTION
d/b/a RushOrderTees.com,	:	
	:	
Plaintiff,	:	CASE NO.
	:	
v.	:	
	:	
DEKEO INC.,	:	
	:	
<i>and</i>	:	
	:	
JIFFYSHIRTS.COM US, L.P.,	:	
Defendants.	:	

**DEFENDANTS DEKEO, INC.'S AND JIFFYSHIRTS.COM US, L.P.'S  
NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendants, Dekeo, Inc. and Jiffyshirts.com US, L.P., by and through their undersigned counsel, hereby removes the subject action from the Court of Common Pleas of Philadelphia County, Pennsylvania to the United States District Court for the Eastern District of Pennsylvania. In support of this Notice of Removal, Defendants state as follows:

**Background**

1. On May 21, 2019, Plaintiff Printfly Corporation d/b/a RushOrderTees.com (“Plaintiff”) commenced this litigation by filing a Complaint in the Court of Common Pleas of Philadelphia County, Pennsylvania (“Complaint”). A copy of the Complaint is attached hereto as Exhibit “A”.
2. The Complaint requested only a declaratory judgment to preclude Defendant Dekeo Inc. from enforcing its Non-Competition Agreement with former employees. *See* Complaint ¶¶ 35-43. The original complaint did not include any claims arising from any federal

statutes and did not request any damages. In addition, the Complaint did not name as a defendant, Jiffyshirts.com US, L.P.

3. On October 31, 2019, Plaintiff filed a Motion for Leave to File an Amended Complaint in the Court of Common Pleas of Philadelphia County, Pennsylvania (“Amended Complaint”). A copy of the Amended Complaint is attached hereto as Exhibit “B”. The Amended Complaint added as a new defendant, Jiffyshirts.com US, L.P. Dekeo, Inc. and Jiffyshirts.com US, L.P. shall collectively be referred to as “Defendants”.

4. The Court of Common Pleas of Philadelphia County, Pennsylvania granted the filing of the Amended Complaint on January 15, 2020. A copy of the Order granting Plaintiff’s Motion to Amend is attached hereto as Exhibit “C”.

5. In its Amended Complaint, Plaintiff has filed, *inter alia*, new claims against Defendants under a Federal statute, the Lanham Act, 15 U.S.C. § § 1125(a)(1)(A) and 1125(a)(1)(B), based on allegations of false and deceptive advertising and a claim for damages under Pennsylvania common law unfair competition. *See* Amended Complaint ¶¶ 127-156.

#### **Timeliness of Removal**

6. 28 U.S.C. § 1446(b) provides that a notice of removal must be filed within 30 days after the defendant receives a copy of the pleading setting forth the claim for relief and the basis of such claim.

7. In terms of a Motion to Amend a Complaint, the 30-day removal period in 28 U.S.C. § 1446(b), begins to run when the state court grants the motion to amend.

8. Plaintiff’s Motion to Amend the Complaint was granted by Court of Common Pleas of Philadelphia County, Pennsylvania on January 15, 2020.

9. The Amended Complaint added Jiffyshirts.com US, L.P., as a defendant on January 15, 2020.

10. Jiffyshirts.com US, L.P. was served with the Amended Complaint on February 6, 2020.

11. The removal of this action is timely as to Dekeo because it was accomplished within thirty (30) days of the date on which Plaintiff's Motion to Amend was granted. *See McDonough v. UGL Unico, et al.*, 766 F.Supp.2d 544, 546 (E.D. Pa. 2011) ("an amended complaint that would provide a basis for subject matter jurisdiction does not become removable until the motion to amend is granted and the amended complaint becomes effective"). "Where leave to amend is required, an amended complaint cannot be operative until that leave has been granted." *Id.*; *see also Sullivan v. Conway*, 157 F.3d 1092, 1094 (7<sup>th</sup> Cir. 1998) (case becomes removable when motion to amend complaint granted adding a federal claim).

12. The removal of this action is timely because it was accomplished within thirty (30) days of the date on which Jiffyshirts.com US, L.P. was served the Amended Complaint.

### **Venue**

13. Pursuant to 28 U.S.C. § 1441(a), the United States District Court for the Eastern District of Pennsylvania is the proper venue for removal because it embraces the place where the action is pending. 28 U.S.C. §§ 1441(a) and 1446(a).

### **Federal Question Jurisdiction**

14. Removal is appropriate because this Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since the cause of action arises under the laws of the United States.

15. According to the Amended Complaint, Plaintiff alleges violations of the Lanham Act, specifically, 15 U.S.C. § § 1125(a)(1)(A) and 1125(a)(1)(B).

16. The Lanham Act is a federal statute that governs trademarks, service marks and unfair competition.

17. Accordingly, this matter presents a federal question and removal is appropriate under 28 U.S.C. § 1441(a).

18. The removal of this action is timely because it was accomplished within thirty (30) days of the date on which the Amended Complaint was filed that added claims under a federal statute and Defendant Jiffyshirts.com US, L.P. was added as a defendant to this case. 28 U.S.C. § 1446(b).

#### **Consent to Removal**

19. All Defendants consent to this removal.

#### **Notice of Removal**

20. Notice of this removal will be promptly filed with the Court of Common Pleas of Philadelphia County, Pennsylvania and served upon all adverse parties.

**WHEREFORE**, Defendants Dekeo, Inc. and Jiffyshirts.com US, L.P., by their undersigned counsel, removes the subject action from the Court of Common Pleas of Philadelphia County, Pennsylvania to this United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

/s/ Larry M. Keller

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*Counsel for Defendants*

Dated: February 10, 2020

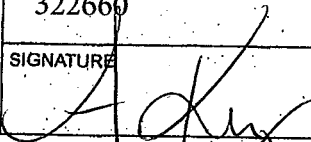
# **Exhibit A**

**Court of Common Pleas of Philadelphia County  
Trial Division  
Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)

**MAY 2019**

**009004**

PLAINTIFF'S NAME Printfly Corporation d/b/a RushOrderTees.com		DEFENDANT'S NAME Dekeo Inc., d/b/a JiffyShirts.com	
PLAINTIFF'S ADDRESS 2727 Commerce Way Philadelphia, PA 19154		DEFENDANT'S ADDRESS 1000 N. West Street Wilmington, DE 19801	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS <div align="center">1</div>	TOTAL NO. OF DEFENDANTS <div align="center">1</div>	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint Writ of Summons <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY: <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Other: _____		
CASE TYPE AND CODE (SEE INSTRUCTIONS) 1C - Contract			
STATUTORY BASIS FOR CAUSE OF ACTION (SEE INSTRUCTIONS)			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)			IS CASE SUBJECT TO COORDINATION ORDER?  <div style="display: flex; justify-content: space-around;"> <div>Yes</div> <div>No</div> </div> <div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> </div>
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY Anton Kaminsky, Esquire		ADDRESS (SEE INSTRUCTIONS) 1524 Locust Street Philadelphia, PA 19102	
PHONE NUMBER 215-735-3900	FAX NUMBER 215-735-2455		
SUPREME COURT IDENTIFICATION NO. 322660		E-MAIL ADDRESS akaminsky@bochettoandlantz.com	
SIGNATURE 		DATE 5/22/19	

## COMMERCE PROGRAM ADDENDUM TO CIVIL COVER SHEET

This case *is* subject to the Commerce Program because it is not an arbitration matter and it falls within one or more of the following types (check all applicable):

- ☐ 1. Actions relating to the internal affairs or governance, dissolution or liquidation, rights or obligations between or among owners (shareholders, partners, members), or liability or indemnity of managers (officers, directors, managers, trustees, or members or partners functioning as managers) of business corporations, partnerships, limited partnerships, limited liability companies or partnerships, professional associations, business trusts, joint ventures or other business enterprises, including but not limited to any actions involving interpretation of the rights or obligations under the organic law (e.g., Pa. Business Corporation Law), articles of incorporation, by-laws or agreements governing such enterprises;
- ☐ 2. Disputes between or among two or more business enterprises relating to transactions, business relationships or contracts between or among the business enterprises. Examples of such transactions, relationships and contracts include:
  - ☐ a. Uniform Commercial Code transactions;
  - ☐ b. Purchases or sales of business or the assets of businesses;
  - ☐ c. Sales of goods or services by or to business enterprises;
  - ☐ d. Non-consumer bank or brokerage accounts, including loan, deposit cash management and investment accounts;
  - ☐ e. Surety bonds;
  - ☐ f. Purchases or sales or leases of, or security interests in, commercial, real or personal property; and
  - ☐ g. Franchisor/franchisee relationships.
- ☒ 3. Actions relating to trade secret or non-compete agreements;
- ☐ 4. "Business torts," such as claims of unfair competition, or interference with contractual relations or prospective contractual relations;
- ☐ 5. Actions relating to intellectual property disputes;
- ☐ 6. Actions relating to securities, or relating to or arising under the Pennsylvania Securities Act;
- ☐ 7. Derivative actions and class actions based on claims otherwise falling within these ten types, and consumer class actions other than personal injury and products liability claims;
- ☐ 8. Actions relating to corporate trust affairs;
- ☐ 9. Declaratory judgment actions brought by insurers, and coverage dispute and bad faith claims brought by insureds, where the dispute arises from a business or commercial insurance policy, such as a Commercial General Liability policy;
- ☐ 10. Third-party indemnification claims against insurance companies where the subject insurance policy is a business or commercial policy and where the underlying dispute would otherwise be subject to the Commerce Program, not including claims where the underlying dispute is principally a personal injury claim.



*Instructions:* Please see Commerce Case Management Program: Procedure for Disposition of Commerce Program Cases Filed On and After January 1, 2000. Arbitration matters are not subject to the Commerce Program. Note that the following types of matters are not to be included in the Commerce Program:

1. Matters subject to Compulsory Arbitration in this Court or to the jurisdiction of the Municipal Court, including any appeals.
2. Personal injury, survival or wrongful death matters.
3. Individual (non-class) consumer claims against businesses or insurers, including products liability and personal injury cases.
4. Matters involving occupational health or safety.
5. Environmental claims not involved in the sale or disposition of a business and other than those addressed in Commerce Program types 9 or 10 above.
6. Matters in eminent domain.
7. Malpractice claims, other than those brought by business enterprises against attorneys, or accountants, architects or other professionals in connection with the rendering of professional services to the business enterprise.
8. Employment law cases, other than those referenced in Commerce Program type 3 above.
9. Administrative agency, tax, zoning and other appeals.
10. Petition Actions in the nature of Change of Name, Mental Health Act Petitions, Petitions to Appoint an Arbitrator, Government Election Matters, Leave to Issue Subpoena, Compel Medical Examination.
11. Individual residential real estate and non-commercial landlord-tenant disputes.
12. Domestic relations matters, and actions relating to distribution of marital property, custody or support.
13. Any matter required by statute, including 20 Pa. C.S. Chapter 7, §§ 711 & 713, to be heard in the Orphans' Court or Family Court Division of the Philadelphia Court of Common Pleas, or other matter which has heretofore been within the jurisdiction of the Orphans' Court or Family Court Division of this Court.
14. Any criminal matter other than criminal contempt in connection with a Commerce Program action.
15. Such other matters as the Court shall determine.

## Instructions for Completing Civil Cover Sheet

Rules of Court require that a Civil Cover Sheet be attached to any document commencing an action (whether the action is commenced by Complaint, Writ of Summons, Notice of Appeal, or by Petition). The information requested is necessary to allow the Court to properly monitor, control and dispose cases filed. A copy of the Civil Cover Sheet must be attached to service copies of the document commencing an action. The attorney or non-represented party filing a case shall complete the form as follows:

### A. Parties

#### i. Plaintiffs/Defendants

Enter names (last, first, middle initial) of plaintiff, petitioner or appellant ("plaintiff") and defendant. If the plaintiff or defendant is a government agency or corporation, use the full name of the agency or corporation. In the event there are more than three plaintiffs and/or three defendants, list the additional parties on the Supplemental Parties Form. Husband and wife are to be listed as separate parties.

#### ii. Parties' Addresses

Enter the address of the parties at the time of filing of the action. If any party is a corporation, enter the address of the registered office of the corporation.

#### iii. Number of Plaintiffs/Defendants: Indicate the total number of plaintiffs and total number of defendants in the action.

### B. Commencement Type: Indicate type of document filed to commence the action.

### C. Amount in Controversy: Check the appropriate box.

### D. Court Program: Check the appropriate box.

### E. Case Types: Insert the code number and type of action by consulting the list set forth hereunder. To perfect a jury trial, the appropriate fees must be paid as provided by rules of court.

#### Proceedings Commenced by Appeal

##### Minor Court

5M Money Judgment  
5L Landlord and Tenant  
5D Dental Open Default Judgment  
5E Code Enforcement  
Other:

##### Local Agency

5B Motor Vehicle Suspension—  
Breathalyzer  
5V Motor Vehicle Licenses,  
Inspections, Insurance  
5C Civil Service  
5K Philadelphia Parking Authority  
5Q Liquor Control Board  
5R Board of Revision of Taxes  
5X Tax Assessment Boards  
5Z Zoning Board  
52 Board of View  
51 Other:

##### Other:

#### Proceedings Commenced by Petition

8P Appointment of Arbitrators  
8C Name Change—Adult  
8L Compel Medical Examination  
8D Eminent Domain  
8E Election Matters  
8F Forfeiture  
8S Leave to Issue Subpoena  
8M Mental Health Proceedings  
8G Civil Tax Case—Petition  
Other:

#### Actions Commenced by Writ of Summons or Complaint

##### Contract

1C Contract  
1T Construction  
1O Other:

##### Tort

2B Assault and Battery  
2L Libel and Slander  
4F Fraud  
1J Bad Faith  
2E Wrongful Use of Civil Process  
Other:

##### Negligence

2V Motor Vehicle Accident  
2H Other Traffic Accident  
1F No Fault Benefits  
4M Motor Vehicle Property Damage  
2F Personal Injury—FELA  
2O Other Personal Injury  
2S Premises Liability—Slip & Fall  
2P Product Liability  
2T Toxic Tort  
T1 Asbestos  
TZ DES  
T2 Implant  
3E Toxic Waste  
Other:

##### Professional Malpractice

2D Dental  
4L Legal  
2M Medical  
4Y Other:

##### 1C Subrogation

##### Equity

E1 No Real Estate  
E2 Real Estate  
1D Declaratory Judgment  
M1 Mandamus

##### Real Property

3R Rent, Lease, Ejectment  
Q1 Quiet Title  
3F Mortgage Foreclosure  
1L Mechanics Lien  
P1 Partition  
Prevent Waste  
1V Replevin  
1H Civil Tax Case—Complaint  
Other:

### F. Commerce Program

Commencing January 3, 2000 the First Judicial District instituted a Commerce Program for cases involving corporations and corporate law issues, in general. If the action involves corporations as litigants or is deemed a Commerce Program case for other reasons, please check this block AND complete the information on the "Commerce Program Addendum". For further instructions, see Civil Trial Division Administrative Docket 01 of 1999.

### G. Statutory Basis for Cause of Action

If the action is commenced pursuant to statutory authority ("Petition Action"), the specific statute must be identified.

### H. Related Pending Cases

All previously filed related cases, regardless of whether consolidated by Order of Court or Stipulation, must be identified.

### I. Plaintiff's Attorney

The name of plaintiff's attorney must be inserted herein together with other required information. In the event the filer is not represented by an attorney, the name of the filer, address, the phone number and signature is required.

**The current version of the Civil Cover Sheet may be downloaded from the FJD's website  
<http://courts.phila.gov>**

**BOCHETTO & LENTZ, P.C.**

By: Gavin P. Lentz, Esquire  
Anton Kaminsky, Esquire

Attorney I.D. No: 53609, 322660

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**PRINTFLY CORPORATION**

d/b/a RushOrderTees.com

2727 Commerce Way

Philadelphia, PA 19154

*Plaintiff*

v.

**DEKEO INC. d/b/a JiffyShirts.com**

1000 N. West Street, Suite 1200

Wilmington, DE 19801

*Defendant*

*Attorney for Plaintiffs*

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY,  
PENNSYLVANIA

**MAY 2019**

No.

**009004**

**COMMERCE PROGRAM**

**NON-JURY**

**NOTICE**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyer Referral and Information Service:  
Court Administrators for Centre County  
Courthouse - Second Floor  
High & Allegheny Streets  
Bellefont, PA 16823  
Telephone: (814) 355-6727

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requerir que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

Lawyer Referral and Information Service:  
Court Administrators for Centre County  
Courthouse - Second Floor  
High & Allegheny Streets  
Bellefont, PA 16823  
Telephone: (814) 355-6727

FILED  
2019 MAY 22 PM 1:07  
OFFICE OF JUDICIAL RECORDS  
FIRST JUDICIAL DISTRICT OF PA

**BOCHETTO & LENTZ, P.C.**

By: Gavin P. Lentz, Esquire  
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*Attorney for Plaintiffs*

**PRINTFLY CORPORATION**

**d/b/a RushOrderTees.com**

2727 Commerce Way

Philadelphia, PA 19154

*Plaintiff*

v.

**DEKEO INC. d/b/a JiffyShirts.com**

1000 N. West Street, Suite 1200

Wilmington, DE 19801

*Defendant*

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY,  
PENNSYLVANIA

No.

**COMMERCE PROGRAM**

**NON-JURY**

**COMPLAINT**

AND NOW, Comes, Plaintiff, Printfly Corporation d/b/a RushOrderTees.com ("Printfly" or "Plaintiff"), by and through undersigned counsel, Bochetto & Lentz, P.C., and hereby states as follows in support of this action for declaratory relief against Defendant, Dekeo Inc. d/b/a JiffyShirts.com ("Dekeo" or "Defendant"):

**THE PARTIES**

1. Plaintiff, Printfly Corporation d/b/a RushOrderTees.com ("Printfly") is a Pennsylvania corporation headquartered in Philadelphia that may be served at 2727 Commerce Way, Philadelphia, PA 19154.

2. Defendant, Dekeo Inc. d/b/a JiffyShirts.com (“Dekeo”) is, upon information and belief a Delaware corporation with a listed business address of 1000 N. West Street, Suite 1200, Wilmington, DE 19801.

3. Dekeo operates a website called JiffyShirts.com which regularly sells and ships blank apparel to Philadelphia County.

4. On May 17, 2019, Dekeo sold and shipped its products to Philadelphia, Pennsylvania for pecuniary gain. (See Purchase and Shipping information for an order Defendant mailed to Philadelphia County attached hereto as **Exhibit “A”**).

5. Dekeo regularly conducts business in Philadelphia County, transacts business in Philadelphia County, and is subject to the jurisdiction of Pennsylvania’s courts.

#### **SUMMARY OF THE CASE**

6. Dekeo has threatened Printfly with litigation despite that there is no basis to sue Printfly. This declaratory judgment has been filed to resolve the controversy between the parties.

7. This dispute arises from Printfly’s recent hire of two of Dekeo’s ex-employees. Shortly after Printfly hired the two individuals, Defendant mailed a notice to Printfly’s Philadelphia headquarters alleging that one of the employees is prohibited from working for Printfly pursuant to the employee’s non-compete agreement with Dekeo. Printfly seeks this Court’s intervention to interpret the Non-Compete agreement (and any other relevant agreements), and to declare that Printfly’s continued employment of the individual is not in violation of the individual’s agreement with Dekeo.

#### **JURISDICTION AND VENUE**

8. This Court has subject matter jurisdiction over this matter pursuant to 42 Pa. C.S.A. § 931(a) and has personal jurisdiction over Defendant pursuant to 42 Pa.C.S.A. § 5322 because

Defendant sells and ships products for pecuniary gain in this Commonwealth, as set forth more fully above.

9. Venue is proper in the Philadelphia County Court of Common Pleas under Rules 1006 and 2179 of the Pennsylvania Rules of Civil Procedure as Printfly is located in Philadelphia County, Defendant regularly conducts business in Philadelphia County, and the occurrence and factual circumstances giving rise to the instant dispute – Jason Haft’s employment with Printfly – occurred in Philadelphia County.

#### **FACTS COMMON TO ALL COUNTS**

10. On May 17, 2019, Printfly received a notice of an alleged breach of Jason Haft (“Mr. Haft”)’s agreement with Dekeo. (*See* May 17, 2019 Letter from Dekeo to Printfly attached hereto as **Exhibit “B”**).

11. According to Defendant’s letter, “Mr. Haft’s employment with Printfly renders him in breach of his Non-Compete Agreement, dated May 17, 2018.” (*See* Ex. B).

12. Additionally, according to the letter, Defendant “has reason to believe that Mr. Haft has participated in soliciting a Company employee, Eric McLeer, to join Printfly in further violation of his Non-Compete Agreement.” (*See* Ex. B).

13. The letter claims that Printfly’s continued employment of Mr. Haft exposes it to significant liability and seeks that Printfly terminate Mr. Haft and “confirm that Mr. Haft is no longer employed with Printfly.”

14. However, Printfly has taken significant measures to ensure that it’s recruitment and continued employment of Mr. Haft and Mr. McLeer does not violate their obligations to Dekeo.

15. Printfly believes that its conduct is not in violation of Mr. Haft’s agreement, any statute, or any Pennsylvania common law and seeks declaratory relief from this Court.

**Dekeo's CEO Admitted that Printfly and Dekeo are Not Competitors**

16. Printfly and Dekeo engage in substantially different businesses; Dekeo, through its website JiffyShirts.com engages in the online retail of *blank apparel* and Printfly, through its website RushOrderTees.com engages in the online retail of *custom printed apparel*.

17. According to Printfly's website, RushOrderTees.com, "[s]ince 2002, we've been obsessing over every detail of *custom printing and apparel*. From *screenprinting and embroidery to tackle twill and foil printing*, our experts can handle any requests of any size. Today we've *printed* over 17 million pieces for over 400,000 happy customers and we're just getting started!" (See RushOrderTees.com webpage attached hereto as **Exhibit "C"**) (emphasis added).

18. Conversely, Dekeo's website expressly states that "*We do not print or embroider*. For blanks, our prices can't be beat!" (See JiffyShirts.com "Contact Us" webpage attached hereto as **Exhibit "D"**) (emphasis added).

19. Although blank apparel is available for purchase through Printfly, it makes up a very small portion of Printfly's business.

20. Importantly, Dekeo's CEO, Chris Serflek ("Mr. Serflek") has acknowledged that Printfly and Dekeo are not competitors.

21. In or about the summer of 2018, while evaluating a decision to hire a Printfly executive and whether the hire would cause the executive to breach his non-compete with Printfly, Mr. Serflek stated that "we fall cleanly outside the definition of competing business" and advocated for the hire.

**Printfly's employment of Jason Haft is not in violation of his Non-Compete Agreement**

22. Mr. Haft's Non-Compete agreement states that for twelve (12) months after his resignation from Dekeo:

Employee agrees not to *engage in competing business practices* in the areas of *reselling blank promotional apparel* and/or online 3<sup>rd</sup> party marketplaces for customization services, in particular in the promotional products industry.

(See Mr. Haft's Non-Compete Agreement attached hereto as **Exhibit "E"**) (emphasis added).

23. Printfly hired Mr. Haft to work on their core business, RushOrderTees.com which sells *custom printed apparel*.

24. Mr. Haft's duties with Printfly will not require him to engage in the areas of reselling blank promotional apparel and/or online 3<sup>rd</sup> party marketplaces for customization services.

25. Accordingly, as long as Mr. Haft is focused on Printfly's core business, *custom printed apparel*, he is not engaging in a business practice that is competitive with Dekeo.

26. Additionally, Printfly has been proactive in "walling-off" Mr. Haft from any portion of Printfly's business that could be viewed as a "competing business practice" and has taken measures to ensure that Mr. Haft does not participate any part of Printfly's business that engages in the resale of *blank promotional apparel*.

27. On April 1, 2019, Printfly notified its other employees that Mr. Haft is not permitted to help or work on any part of Printfly's business that resells blank t-shirts or 3<sup>rd</sup> party marketplaces and implemented rules to ensure that Mr. Haft is walled off from participating or assisting with anything that may cause Printfly to run afoul of Mr. Haft's Non-Compete.

28. Additionally, in correspondence dated May 10, 2019, Printfly assured Dekeo that it notified its employees about Mr. Haft's agreement and intends to ensure that he doesn't violate his agreement. (See Printfly's May 10, 2019 Letter and its enclosed exhibits attached hereto as **Exhibit "F"**).



29. Accordingly, Printfly seeks that this Court declare that Mr. Haft's continued employment for Printfly's core RushOrderTees.com business is not in violation of his agreement with Dekeo.

**Mr. Haft did not Directly or Indirectly Solicit Eric McLeer**

30. Upon information and belief, Mr. McLeer does not have a Non-Compete agreement with Dekeo.

31. Although Defendant has not mailed a separate notice for Eric McLeer ("Mr. McLeer"), in its May 17, 2019 letter, Defendant alleged that Mr. Haft "participated in soliciting" Mr. McLeer. (*See Ex. B*).

32. As set forth in Plaintiff's correspondence to Defendant dated May 10, 2019, both Mr. Haft and Mr. McLeer provided signed affidavits specifically stating that Mr. Haft did not solicit or otherwise participate in Mr. McLeer's hire. (*See Ex. F*).

33. Also attached to Plaintiff's letter are text messages between Printfly's Executive Vice President of Finance, Kane Posner, and Mr. McLeer which demonstrate that Printfly was recruiting Mr. McLeer long before it hired Mr. Haft and that Mr. Haft did not directly or indirectly solicit Mr. McLeer. (*See Ex. F*).

34. Accordingly, Printfly seeks that this Court declare that Printfly's conduct does not violate or induce the violation of any of the restrictive covenants that Mr. Haft and Mr. McLeer entered into with Dekeo.

**COUNT I  
(REQUEST FOR DECLARATORY RELIEF)  
PRINTFLY v. DEKEO**

35. Plaintiff repeats and re-alleges all other allegations of this Complaint as if set forth at length herein.

36. According to Dekeo's May 17, 2019 Letter, Printfly is in danger of being subject to imminent and continued litigation from Dekeo in the event that Printfly retains two newly hired employees. (*See* Ex. B).

37. Pursuant to Pennsylvania Law, this Court is empowered to declare the status and other legal relations of parties whether or not further relief is or could be claimed. 42 Pa.C.S. § 7532 (2010).

38. Printfly has not caused or induced Mr. Haft to violate his contractual obligations to Dekeo.

39. Because Printfly core business does not compete with Dekeo, and because Mr. Haft will not engage in business practices that compete with Dekeo, Printfly's hire and continued employment of Mr. Haft in its core business of custom printed apparel does not amount to a violation of Mr. Haft's contractual obligations to Dekeo.

40. Further, Mr. Haft has been "walled-off" from any portion of Printfly's business that involves the resale of blank promotional apparel.

41. Upon information and belief, Mr. McLeer is not bound by a Non-Compete agreement with Dekeo.

42. Nevertheless, Printfly has not caused or induced Mr. McLeer to violate any of his contractual obligations to Dekeo.

43. Printfly seeks an order from this Court acknowledging that Mr. McLeer and Mr. Haft's employment with Printfly is not considered employment in a "competing industry" and permitting it to continue employing Mr. Haft and Mr. McLeer at its Philadelphia headquarters.

**WHEREFORE**, Printfly requests a declaratory judgment in its favor and against Defendant precluding Dekeo from enforcing the inapplicable terms of its Non-Competition


Agreement with Mr. Haft and/or Mr. McLeer along with such other relief as the Court deems equitable and just.

Respectfully Submitted,

**BOCHETTO & LENTZ, P.C.**

Date: May 21, 2019

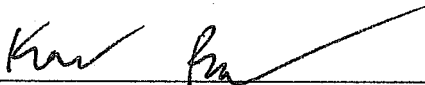
By:

  
Anton Kaminsky, Esquire  
*Attorney for Plaintiffs*

**VERIFICATION**

I, Kane Posner, hereby verify that the statements made in the foregoing *Complaint* are true and correct to the best of my knowledge, information and belief. I am aware that false statements of fact made knowingly are subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

May 21, 2019  
Date

  
\_\_\_\_\_  
Kane Posner, Executive VP of Finance  
Printfly Corporation

# EXHIBIT “A”

<https://mail.google.com/mail/u/0?ik=76e9c96c709&ui=enht9cc9ah=all9norm-modid=msg-fd/2A1G22812600479002370&simpl=msg-fd/2A1G228126004>



Please inspect your delivered order.

Claims for missing, wrong, or damaged items must be made within  
3 days of final delivery (by Thu, May 23, 2019).

Returns within 45 days (by Mon, July 1, 2019).



Return, Refunds & Exchanges  
[Read More](#)



Have a Question?  
[Contact Us](#)

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--  
**Gavin P. Lentz, Esquire**  
Bochetto & Lentz P.C.  
1524 Locust St.  
Philadelphia, PA 19102  
215-735-3900  
[www.bochettoandlentz.com](http://www.bochettoandlentz.com)

**WORK PRODUCT REDACTION**

**From:** "JiffyShirts.com Orders" <orders@jiffyshirts.com>  
**Date:** May 17, 2019 at 7:05:49 PM EDT  
**To:** glentz@bochettoandlentz.com  
**Subject:** Shipment for Order 22649958



BELLA+CANVAS.  
LOS ANGELES  
3413C



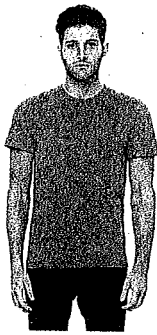
5/20/2019

Bochetto & Lentz Mail - Fwd: Shipment for Order 22649958

**\$7.63**

**1**

**\$7.63**



Please inspect your delivered order.

Claims for missing, wrong, or damaged items must be made within  
3 days of final delivery (by Thu, May 23, 2019).

Returns within 45 days (by Mon, July 1, 2019).



Return, Refunds & Exchanges  
[Read More](#)



Have a Question?  
[Contact Us](#)

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# WORK PRODUCT REDACTION

Begin forwarded message:

**From:** "JiffyShirts.com Orders" <orders@jiffyshirts.com>  
**Date:** May 21, 2019 at 1:46:12 AM EDT  
**To:** glentz@bochettoandlentz.com  
**Subject:** Your shipment was delivered! Jiffyshirts Order 22649958



**Shipment Delivered**  
Order 22649958

Hi Gavin,

Delivery for Order# 22649958 was delivered.

RECEIVED AT: Mon, May 20, 2019 4:23 PM EDT

Thanks for shopping with JiffyShirts.com!

## Shipment Details

### Shipping To:

Gavin Lentz  
1524 Locust St  
PHILADELPHIA, PA  
19102 4401

### Shipping:

UPS Ground

### Tracking:

1ZA82T890307894968

[View Tracking Information](#)

Delivery: Delivered Mon, May 20, 2019

Unisex Triblend Short-Sleeve T-Shirt

5/21/2019

Bochetto & Lentz Mail - Fwd: Your shipment was delivered! Jiffyshirts Order 22649958

Teal Triblend

L

BELLA+CANVAS.  
LOS ANGELES

3413C



**\$7.63**

**1**

**\$7.63**

Please inspect your delivered order.

Claims for missing, wrong, or damaged items must be made within  
3 days of final delivery (by Thu, May 23, 2019).

Returns within 45 days (by Mon, July 1, 2019).

Return Items



Return, Refunds & Exchanges  
[Read More](#)



Have a Question?  
[Contact Us](#)

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# EXHIBIT “B”



Gerard O'Shea  
+1 212 479 6704  
goshea@cooley.com

*Via FedEx (Overnight) and Email*

May 17, 2019

Michael Nemeroff  
Founder/ Chief Executive Officer  
Printfly Corporation  
2727 Commerce Way  
Philadelphia, PA 19154  
michael@rushorderteets.com

**Re: Jason Haft's Breach of Non-Compete Agreement**

Dear Mr. Nemeroff:

This firm represents Shirt S&D Management LLC ("S&D"), which owns and operates Dekeo Inc. ("Dekeo") and JiffyShirts.com U.S. L.P. ("JiffyShirts") (JiffyShirts, Deko, and S&D collectively referred to herein as the "Company"), and recently learned that Jason Haft, a former Dekeo employee, is now working for Printfly Corporation ("Printfly"). Please be advised that Mr. Haft's employment with Printfly renders him in breach of his Non-Compete Agreement, dated May 17, 2018 ("Non-Compete Agreement"). In addition, we have reason to believe that Mr. Haft has participated in soliciting a Company employee, Eric McLeer, to join Printfly in further violation of his Non-Compete Agreement. Moreover, and perhaps even more troubling, is the Company's recent discovery that Mr. Haft has misappropriated Company confidential information and trade secrets.

As I am sure you are well aware, Mr. Haft's violation of his Non-Compete Agreement and misappropriation of Company confidential information and trade secrets subjects him, and potentially Printfly, to significant liability, including unfair competition, tortious interference, business torts, and intellectual property claims in the event that Mr. Haft has introduced confidential Company information to Printfly's IT systems or otherwise disclosed such information to Printfly. We have written to Mr. Haft concerning the same and have demanded that he immediately resign from his employment with Printfly, cease and desist from soliciting Company employees, and return all Company property, or face immediate legal action. A copy of the letter to Mr. Haft along with the Non-Compete Agreement and Mr. Haft's Employment Agreement is annexed, which we encourage Printfly and its legal counsel to carefully review.

At this stage, the Company has no reason to believe that Printfly is complicit with Mr. Haft's illegal activity and, provided that Printfly acts honorably and expeditiously in line with the steps described below, believes that a dispute between the Company and Printfly can be avoided. Specifically, to avoid litigation, we must receive written notice from Printfly by **May 24, 2019**: (a) confirming that Mr. Haft is no longer employed with Printfly; (b) confirming that Printfly has searched Mr. Haft's Printfly computer and Printfly's other IT systems for any Dekeo or JiffyShirts documents or other materials or information introduced to Printfly by Mr. Haft about Dekeo or JiffyShirts; and (c) describing any such Company materials to the undersigned in sufficient detail. Upon Printfly timely fulfilling all of the above demands, the Company will coordinate with Printfly on an appropriate method for the Company to retrieve its property and for resolving the matter.

Mr. Michael Nemeroff  
Printfly Corporation  
May 17, 2019  
Page 2

While we fully expect Printfly to disavow Mr. Haft's illegal conduct and to cooperate in this matter, we are compelled to put Printfly on notice of potential litigation. As such, you should preserve and not delete or otherwise destroy any e-mails, text messages, voice mails, contracts, documents, and other materials or electronic data related to Mr. Haft's current employment, the above-referenced agreements and Mr. Haft's contacts with the Company's customers, his recruitment, or his recruitment of any Company employees. Moreover, should litigation occur, the Company will undoubtedly seek discovery regarding the steps taken by Printfly to prevent Mr. Haft's solicitation of the Company's customers or its employees and the disclosure of its confidential information.

Please understand that the Company takes this matter very seriously and has instructed this firm to immediately commence litigation if we do not timely receive the above assurances and feedback. Accordingly, please contact me immediately if you have any questions about this letter. The Company reserves all rights.

Yours very truly,

A handwritten signature in black ink, appearing to read "Gerard D. O'Shea". The signature is fluid and cursive, with the first name "Gerard" and last name "O'Shea" clearly distinguishable.

Gerard O'Shea

Enclosures

# EXHIBIT “C”

Started Now



## RUSH DELIVERY

Guaranteed on **Wed May 22**  
for orders placed by Midnight

## FREE DELIVERY

Guaranteed on **Fri May 31**  
for orders placed by Midnight

Need your order sooner? Call us now (800) 620-1233



## Embroider Your Logo on Hundreds of Products

Any size order. Any deadline.

[Shop Shirts](#)

[Shop Hats](#)

## Live Customer Reviews



4.78/5 based on 7963 reviews



Tips and Templates for Your Team, Event or Group Order

## Basketball



Get Started

## Family Reunions



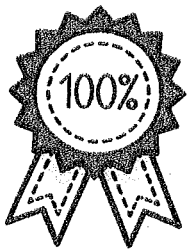
Get Started

## Bachelorette Party



Get Started

## Why So Many Choose Us



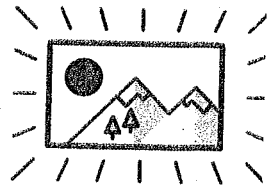
### Satisfaction Guaranteed

We guarantee to deliver each order to your satisfaction and nothing less, because we know that's what you deserve.



### Better Pricing

With free shipping and competitive pricing, we provide our high-quality products for a price and standard unmatched anywhere.



### Design Review & Perfection

Our professional in-house design team reviews and repairs every order to ensure each one is perfect.

Rush T-Shirt Deliveries

Design Review and Repair

Team Personalization

Direct to Garment

Tackle Twill

Foil Printing

50th Anniversary



ner of the Philadelphia 76ers

**Inc.**  
**5000**

Recognized as One of the Fastest  
Growing Private Companies in America

**The**  
**New York**  
**Times**

Featured in the New York Times  
Section

Since 2002, we've been obsessing over every detail of custom printing and apparel. From screenprinting and embroidery to tackle twill and foil printing, our experts can handle any requests of any size. Today, we've printed over 17 million pieces for over 400 000 happy customers and we're just getting started!

CONTACT



# EXHIBIT “D”

We are proud to offer the finest selection of blank clothing in America.

## Placed an Order Already? - Contact the Orders Department

Please enter the information below. (usually takes less than 2 minutes to complete) \* - is required information.

The order number is 8 characters and looks like "12345678" in our email. It is also the "PO Number" on the paper in your box with 9 or more characters and looks like "123456781"

Order Number:\*

Last Name on Billing Address:\*

Select a Request:\*

Pick one of the following below...

Continue with Request

Did you get my order? What is my order number?

Your email address:

Check Now

Have a request not listed above?

Requests submitted using the form are served first. Use the form above for fastest service. Otherwise you can email [orders@jiffyshirts.com](mailto:orders@jiffyshirts.com). Note your order number and how we can help.

You can find our Return/Exchange/Cancellation/Change policies [here](#).

## Having a Tech Issue?

Having a problem with the website? Quick and easy, report a tech issue. We will look into the issue and get it resolved as soon as possible.

## Placing a New Order?

Answers to most questions are in our Help and Policies Section

**We do not print or embroider. For blank, our prices can't be beat!**

We ask customers to place orders directly on our easy to use web site. Help keep our prices low!

Now 24 hours a day and 7 days a week, find the following Only at JiffyShirts.com!

- **Show all the product information we have.** That includes images, sizing information, descriptions, materials, material weight, and color samples.
- **Complete inventory information.** Don't worry about out-of-stock items or substitutions. We show which products are good for small or bulk orders. We won't sell what we don't have.
- **Shipping and delivery dates.** No unclear "usually ships", "shipping today" on a Sunday, or special shipping conditions. We check our warehouses and automatically ship the order to you as fast as possible at no extra charge.
- **Fastest shipping at no extra charge.** Don't pay more for Next Day shipping. We don't even have to offer this service. We use our national network of 10 warehouses to provide fast deliveries at UPS Ground rates.
- **Free or cheap shipping.** Just enter your address. We clearly show free or the cheap flat-rate shipping fee on the cart page. You do not need to create an account or give personal information first.
- **We won't change your order.** We never backorder, remove out-of-stock items and ship the rest, or substitute items. We show inventory information so you can buy what we have in stock.
- **Automatic bulk discounting.** You don't have to call and bargain hoping to get a fair price. We automatically give the maximum discount on customers.

4.8 ★★★★★

Google

Customer Reviews

5/20/2019

Customer Service - JiffyShirts.com

- **No Resellers Permit needed or tax charged.** Open to the public. Enter your shipping address and the cart page will show the final price. There are no hidden fees and extra costs later.
- **Tracking info emailed on the shipping day.** Don't worry about your package. We send the tracking information automatically.
- **We do not keep your credit card information.** Safer than phone or fax orders. We don't want people to see our information, why would you? Our staff never sees your complete credit card information. To protect you from hackers, we use advanced security. Once your order is complete, we delete this information from our system. For your protection, you must enter this private information for every order.
- **We respect and protect your privacy.** We never share your information. We delete all we can after shipping. We never harass you with junk email.

More than just the lowest delivered price. We make it easy for you to be fully informed. Place an order yourself, at any time of the day.

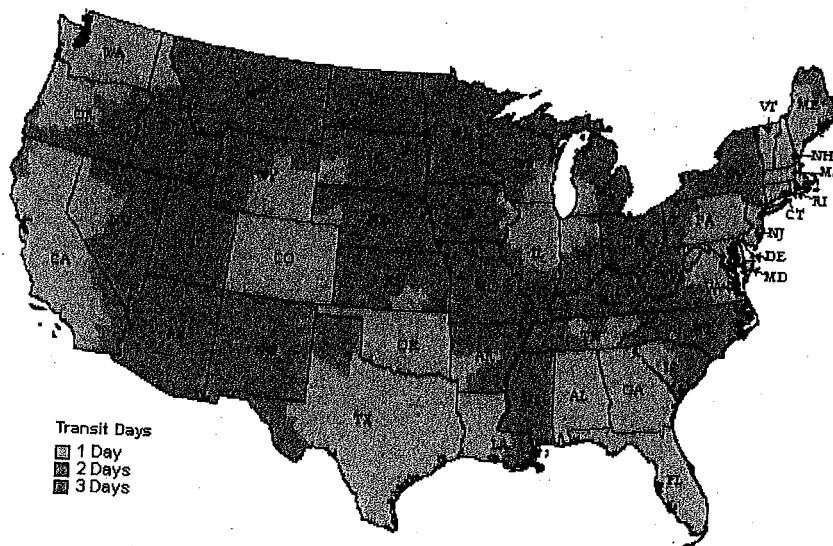
There are many things you will find Only at JiffyShirts.com!

Answers to more questions are in our Help and Policies Section.

Still don't have the answer you need? You can email us at [service@jiffyshirts.com](mailto:service@jiffyshirts.com)

Our site is secured by a \$100,000 Warranty protected encryption certificate. It is 2 times stronger than other internet sites. You can read more in our Help Section.

JiffyShirts.com shipping from 10 warehouses in our national warehouse network.



Do not return items to this address. Submit a return request for a free return shipping label.

JiffyShirts.com  
1000 N. West St. Suite 1200  
Wilmington, DE 19801

Do not return items to this address. Submit a return request for a free return shipping label.

# EXHIBIT “E”



## NON-COMPETE AGREEMENT

This Non-compete Agreement (the "Agreement") is entered into this 17<sup>th</sup> day of May 2018 by and between The Dekeo Group, (the "Employer/Company") and Jason Haft, (the "Employee"). Employer/Company and Employee may each be referred to from the time to time herein as a "Party," and may collectively be referred to herein as the "Parties".

### 1. Acknowledgement

The Dekeo Group, by way of its ownership of JiffyShirts.com US LP, operates as an online reseller of blank and promotional apparel. As at the date of this agreement, the Employer intends on expanding both its product offering to include hard promotional goods and its business to include an online marketplace servicing the promotional products industry. Employee hereby acknowledges that the restrictions contained in this agreement are:

- a) fair and reasonable in scope and duration,
- b) necessary to protect Employer's legitimate business interests

### 2. Competition

Employee agrees not to engage in competing business practices in the areas of reselling blank promotional apparel and/or online 3<sup>rd</sup> party marketplaces for customization services, in particular in the promotional products industry for a period of six (6) months if employment is terminated by the Employer without cause or if employee resigns with good reason. In the event employment is terminated by the Employer for cause or the employee resigns without good reason, this non-compete shall remain effective for a period of one year. "Good Reason" and "Cause" are defined separately in the Employment Agreement dated May 11<sup>th</sup>, 2018, and executed on May 13<sup>th</sup>, 2018. This includes, any research, engineering, product development in any geographical area where the Company is located, conducts business, or provides service to customers. This does not include business practices related to the wholesaling of blank promotional apparel.

### 3. Remedies

The Company may pursue any and all remedies available to it and the pursuit of one remedy will not be deemed to exclude any other remedies, including, but not limited to recovery of damages and reasonable legal fees. The Company shall have the right to injunctive relief to restrain and enjoin any actual or threatened breach of the provisions contained in this Agreement.

#### 4. Severability

If any provision in this Agreement is deemed to be invalid or unenforceable for any reason, it will not affect the remaining provisions and those provisions will continue to be valid and enforceable

#### 5. Governing Law

This Agreement shall be governed by, construed and enforced solely and exclusively in accordance with the laws of the State of Delaware, USA, without reference to conflict of law principles. Any and all disputes under this Agreement must be brought solely and exclusively in the state courts and the Federal courts located in Delaware, USA, and the parties hereby irrevocably consent to the personal jurisdiction and venue of these courts. This Agreement may not be amended except by a writing signed by both parties.

6. Entire Agreement This Agreement contains the entire agreement and understanding by and between the Company and Employee with respect to the covenants in this agreement. Further, any representations, promises, agreements, or understandings, written or oral, not contained in this Agreement shall have any force or effect.

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed by their respective duly authorized representatives below.

The Dekeo Group

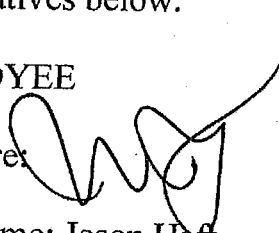
Signature:

Print Name: Christopher Serflek

Title: Director

Date: May 17, 2018

EMPLOYEE

Signature: 

Print Name: Jason Haft

Title: Vice President, Growth

Date: 5/17/18

# EXHIBIT “F”

# BOCHETTO & LENTZ

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

1524 LOCUST STREET

PHILADELPHIA, PA 19102

TELEPHONE: (215) 735-3900

TELECOPIER: (215) 735-2455

FIRM WEB SITE:

[bochettoandlentz.com](http://bochettoandlentz.com)

E-MAIL ADDRESS:

[akaminsky@bochettoandlentz.com](mailto:akaminsky@bochettoandlentz.com)

NEW JERSEY OFFICE

6000 SAGEMORE DRIVE, SUITE 6301

MARLTON, NJ 08053-3900

TELEPHONE: (856) 722-9595

TELECOPIER: (856) 722-5511

\* ADMITTED TO NEW JERSEY BAR

† ADMITTED TO NEW YORK BAR

^ ADMITTED TO D.C. BAR

■ ADMITTED TO VIRGINIA BAR

GEORGE BOCHETTO<sup>†</sup>  
GAVIN P. LENTZ\*  
JEFFREY W. OGREN\*  
DAVID P. HEIM\*  
VINCENT van LAAR\*  
BRYAN R. LENTZ\*  
JOHN A. O'CONNELL\*  
PETER R. BRYANT\*  
ANTON KAMINSKY\*  
DANIELLE CHILDS  
KIERSTY DeGROOTE \*

ALBERT M. BELMONT, III\*  
OF COUNSEL

JANINE BAKER  
JOANNE GUARALDO  
MARGARET E. KAMINS  
TUESDAY WOLF  
SUSAN FLAHERTY  
QUINN GALLAGHER  
PARALEGALS

PRACTICE DEDICATED TO LITIGATION  
AND NEGOTIATION MATTERS

May 10, 2019

**VIA E-MAIL TO: [chris@dekeo.com](mailto:chris@dekeo.com)**

**AND CERTIFIED MAIL TO:**

The Dekeo Inc.

ATTN: Chris Serflek

1000 N. West Street, Suite 1200

Wilmington, DE 19801

**RE: Jason Haft and Eric McLeer**

To whom it may concern:

This office is litigation counsel for Printfly Corporation d/b/a RushOrderTees.com ("Printfly"). Printfly notified me that The Dekeo Inc. ("Dekeo") raised a potential dispute regarding Printfly's hire of Jason Haft ("Jason") and Eric McLeer ("Eric"). Specifically, that Dekeo believed that Jason and/or Eric were in violation of their employment agreements with Dekeo. Printfly asked me to review Jason and Eric's agreements, Printfly's process in hiring both Jason and Eric, and provide Dekeo with a written response.

Please be assured that Jason and Eric have been fully compliant and will continue to fully comply with all of the terms of their agreements with Dekeo. In that regard, please see the signed affidavits of Jason and Eric attached hereto. Further, Printfly has notified its employees about Jason and Eric's agreements, intends to ensure that Jason and Eric do not violate their agreements, and will take reasonable measures to avoid putting either employee in a position to violate their agreements.

Additionally, please see the enclosed text messages between Printfly's Executive Vice President of Finance), Kane Posner ("Kane"), and Eric dating back to January of 2019, long before Jason joined Printfly. These messages conclusively show that Jason had nothing to do with Eric's hire and is clearly not in violation of the non-recruitment / non-solicitation clause of his agreement with Dekeo.

**BOCHETTO & LENTZ, P.C.**

May 10, 2019

Page 2 of 2

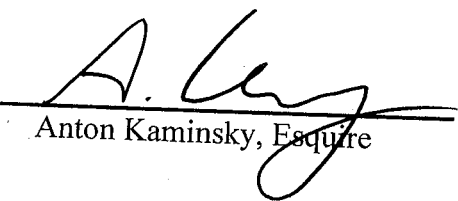
I believe that this letter, the enclosed documents, and Printfly's assurances should be sufficient to prevent any further disputes between the parties. If you are represented by counsel, please forward this letter to their attention. If you have any questions or additional concerns, please contact me or have your counsel contact me directly.

Thank you for your attention in this matter.

Sincerely,

**BOCHETTO & LENTZ, P.C.**

BY:

  
Anton Kaminsky, Esquire

Enclosures

**Affidavit of Jason Haft**

I, Jason Haft, being duly sworn state as follows:

1. My name is Jason Haft and I reside a 1054 North Kimbles Rd, Yardley PA 19067.
2. I was previously employed by The Dekeo Inc. ("Dekeo") from 7/9/2018 to 3/29/2019.
3. During my employment with Dekeo, I worked out of my home office, located at 1054 North Kimbles Rd, Yardley PA 19067.
4. My job title at Dekeo was Vice President – Growth.
5. I started working at Printfly Corporation ("Printfly") as a Executive Vice President – Operations & Growth on 4/1/2019.
6. While employed at Dekeo and since my departure from Dekeo, I have not recruited or participated in the recruitment of any employees of Dekeo.
7. Specifically, I did not participate in the recruitment of Eric McLeer.
8. While employed at Dekeo and since my departure from Dekeo, I have not directly or indirectly solicited, or sought to interfere with any customer or supplier of Dekeo in any manner that conflicts with or interferes with Dekeo's business.
9. When I ceased being employed by Dekeo, I did not retain any proprietary or confidential information belonging to Dekeo.
10. I intend to continue to honor and abide by the terms of my employment agreement with Dekeo.
11. I hereby swear and affirm that the foregoing statements made by me are true and correct to the best of my knowledge. I am aware that if any of the above statements are willfully false, I am subject to punishment.

Date: May 9, 2019

BY: \_\_\_\_\_

Jason Haft

**Affidavit of Eric McLeer**

I, Eric McLeer, being duly sworn state as follows:

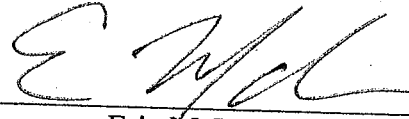
1. My name is Eric McLeer and I reside at 8633 Marigold Place, Philadelphia, PA 19136.
2. I have been employed by The Dekeo Inc. ("Dekeo") since 10/29/2018 with a title of Manager, Business Analytics.
3. I resigned from Dekeo, effective 05/27/2019.
4. During my employment with Dekeo, I worked out of my home office, located at 8633 Marigold Place, Philadelphia, PA 19136.
5. I am scheduled to start working at Printfly Corporation ("Printfly") as the Director of Financial Planning & Analysis on 05/28/2019.
6. I was recruited to Printfly by Kane Posner.
7. Jason Haft had no participation in my recruitment to Printfly.
8. While employed at Dekeo, I have not recruited or participated in the recruitment of any employees of Dekeo.
9. Specifically, I did not participate in the recruitment of Jason Haft.
10. When I cease being employed by Dekeo, I do not intend to recruit or participate in the recruitment of any employees of Dekeo.
11. While employed at Dekeo, I have not directly or indirectly solicited, or sought to interfere with any customer or supplier of Dekeo in any manner that conflicts with or interferes with Dekeo's business.
12. When I cease being employed by Dekeo, I do not intend to directly or indirectly solicit or seek to interfere with any customer or supplier of Dekeo in any manner that conflicts with or interferes with Dekeo's business.
13. When I cease being employed by Dekeo, I will not retain any proprietary or confidential information belonging to Dekeo.

14. I intend to continue to honor and abide by the terms of my employment agreement with Dekeo.

15. I hereby swear and affirm that the foregoing statements made by me are true and correct to the best of my knowledge. I am aware that if any of the above statements are willfully false, I am subject to punishment.

Date: May 9, 2019

BY:

A handwritten signature in black ink, appearing to read 'E McLeer', written over a horizontal line.

Eric McLeer



1/17/19, 8:43 PM

Didn't get a chance to circle back with Mike today but shooting for tomorrow - definitely didn't forget it.

No worries... Figured you just didn't get the opportunity this afternoon 🙄

1/22/19, 5:05 PM

Hey buddy, just circling back to see if you ever got a chance to catch up with Mike.

1/22/19, 9:01 PM

I did - still trying to figure out where you'd fit, but working on it. Let me get you a better answer later this week.

1/23/19, 7:04 AM



Okay sounds good. Not sure if its just coincidence or (potentially) good timing but things seem to be heading south a bit quickly since last Thursday morning. Can explain more when we chat next. Talk soon.

2/6/19, 2:41 PM

Hey, were you still thinking of having me stop in this week, or is that on hold for now?

2/6/19, 5:49 PM

This week Mike's out of the office - let's plan for next week. I'll get you a date/time later this week.

2/6/19, 8:12 PM

Sounds good. Monday is less than ideal because I think I'll be without a car for most of the day, but everything else I should be able to make work no problem.

2/12/19, 9:32 AM

Taking longer than I would've anticipated to finalize this first piece of the puzzle (locking in me and some other guys), but on a bright note I've put the head of finance on notice and that position will be vacated in the not too distant future. Sorry this is taking so long, but I'm still working on it....

2/12/19, 11:29 AM

No worries -- sometimes good things just take a little bit of extra time to get right 🙌.

# **Exhibit B**

**BOCHETTO & LENTZ, P.C.**

By: Gavin P. Lentz, Esquire  
Anton Kaminsky, Esquire

Attorney I.D. No: 53609, 322660

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*Attorney for Plaintiffs*

**PRINTFLY CORPORATION**

**d/b/a RushOrderTees.com**

2727 Commerce Way

Philadelphia, PA 19154

*Plaintiff*

v.

**DEKEO INC.**

1000 N. West Street, Suite 1934

Wilmington, DE 19801

**And**

**JIFFYSHIRTS.COM US, LP.**

1000 N. West Street, Suite 1934

Wilmington, DE 19801

*Defendant*

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY,  
PENNSYLVANIA

No. 190509004

**COMMERCE PROGRAM**

**NON-JURY**

**NOTICE**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyer Referral and Information Service:  
Court Administrators for Centre County  
Courthouse - Second Floor  
High & Allegheny Streets  
Bellefont, PA 16823  
Telephone: (814) 355-6727

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requerir que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

Lawyer Referral and Information Service:  
Court Administrators for Centre County  
Courthouse - Second Floor  
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Bellefont, PA 16823  
Telephone: (814) 355-6727

**Case ID: 190509004**



**BOCHETTO & LENTZ, P.C.**

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*Attorney for Plaintiff*

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**PRINTFLY CORPORATION**

**d/b/a RushOrderTees.com**

2727 Commerce Way  
Philadelphia, PA 19154

*Plaintiff*

v.

**DEKEO INC.**

1000 N. West Street, Suite 1934  
Wilmington, DE 19801

*And*

**JIFFYSHIRTS.COM US, L.P.**

1000 N. West Street, Suite 1934  
Wilmington, DE 19801

*Defendants*

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COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY,  
PENNSYLVANIA

No. 190509004

**COMMERCE PROGRAM**

**NON-JURY**

**AMENDED COMPLAINT**

**AND NOW**, Comes, Plaintiff, Printfly Corporation d/b/a RushOrderTees.com (“Printfly” or “Plaintiff”), by and through undersigned counsel, Bochetto & Lentz, P.C., and hereby states as follows in support of this Amended Complaint against Defendants, Dekeo Inc. (“Dekeo”) and Jiffyshirts.com US, L.P. (“Jiffy”) (collectively “Defendants”):

## THE PARTIES

1. Plaintiff, Printfly Corporation d/b/a RushOrderTees.com (“Printfly”) is a Pennsylvania corporation headquartered in Philadelphia that may be served at 2727 Commerce Way, Philadelphia, PA 19154.

2. Defendant, Dekeo Inc. (“Dekeo”) is, upon information and belief a Delaware corporation with a listed business address of 1000 N. West Street, Suite 1934, Wilmington, DE 19801.

3. Defendant, Jiffyshirts.com US, L.P. (“Jiffy”) is, upon information and belief a Delaware corporation with a listed business address of 1000 N. West Street, Suite 1934, Wilmington, DE 19801.

4. At all times material hereto, Dekeo and/or Jiffy operated two websites. [www.jiffyshirts.com](http://www.jiffyshirts.com) and [www.dekeo.com](http://www.dekeo.com). However, after Plaintiff filed their original complaint, Defendants removed [www.dekeo.com](http://www.dekeo.com) and relocated it to [www.jiffyshirts.com/print](http://www.jiffyshirts.com/print). Because it is unclear which entity operates which website(s), unless referred to specifically or individually, Defendants are collectively referred to hereinafter as “Defendants” or “Jiffy.”

5. Jiffy operates a website called JiffyShirts.com which regularly sells and ships blank apparel (“Blank Apparel Business”) to Philadelphia County.

6. On May 17, 2019, Jiffy sold and shipped its products to Philadelphia, Pennsylvania for pecuniary gain. (See Purchase and Shipping information for an order Defendant mailed to Philadelphia County attached hereto as **Exhibit “A”**).

7. Jiffy regularly conducts business in Philadelphia County, transacts business in Philadelphia County, and is subject to the jurisdiction of Pennsylvania’s courts.

8. Jiffy also operates a website called Dekeo.com (recently relocated to jiffyshirts.com/print) which purports to be a marketplace of companies that design, print and embroider on apparel (“Decorated Apparel Business”).

### **SUMMARY OF THE CASE**

9. In early 2019, a dispute arose between Printfly and Jiffy about unrelated matters wherein Jiffy alleged that Printfly was its competitor. In response to that dispute, Printfly reviewed Jiffy’s websites and determined that, dating back to at least 2017, Jiffy was making countless inaccurate, misleading and knowingly false representations to the public on their website and in their advertisements in an effort to promote sales of their products. Defendants’ conduct in this regard is in clear and blatant violation of Pennsylvania’s common law relating to unfair competition, as well as the false advertising and misleading statements of fact provisions of the Lanham Act, 15 U.S.C. §§ 1125(a)(1)(A) and 1125(a)(1)(B).

10. By way of limited example only, Defendants misrepresent that they have the “cheapest prices,” “fastest delivery,” and indicate that apparel is discounted from significantly higher prices which, upon information and belief, Defendants don’t and never have charged any consumers in the marketplace. Additionally, Defendants advertise that they have a free shipping sale expiring at the end of each month that never actually expires.

11. Further, the prices advertised by the Defendants on Google and on their website for specific products are not the actual prices when the item is selected, and require a purchaser to buy the product in a different color, in bulk, or for the purchaser’s shopping cart to exceed a certain monetary amount. In fact, unless a customer buys in bulk, the actual price of the apparel is sometimes as much as double the advertised price and the advertised discount can never be achieved for the specific product, irrespective of the quantity ordered.

12. Such conduct amounts to unfair competition and creates injury and/or a likelihood of injury to The Deal Rack (“TDR”), a business Printfly recently acquired that resells blank apparel.

13. Separately, upon information and belief, Defendants Decorated Apparel Business is soliciting decorators that compete with Printfly’s core brand RushOrderTees.com (“ROT”) from a proprietary and confidential list that was unlawfully obtained by one of Defendants’ executive level employees, Jason Buchanan (“Buchanan”) from his prior employer Alphabroder (“Alpha”) with the knowledge and permission of Defendants’ CEO, Chris Serflek (“Serflek”).

14. Further, Defendants’ Decorated Apparel Business contains countless reviews of individual decorators using industry buzzwords and words that sound similar to Plaintiff’s “rush order” business, but no method of actually leaving a review for the decorator on the website. Upon information and belief those reviews are not genuine and placed solely to confuse customers, deceive customers, are misrepresentations about quality approval of Defendants’ goods and the decorators that Defendants assembled for their website.

15. Such conduct amounts to unfair competition, a violation of the Lanham Act, and creates a likelihood of injury to Printfly’s core business ROT which engages in the customization, printing, embroidering, and other decoration of apparel.

16. Upon information and belief, Defendants are recklessly, intentionally, knowingly, and/or purposely engaging in this conduct in an effort to confuse customers as to the price and quality of their goods, to maximize profits based on misleading information, and to game their position and search results on Google.

17. Printfly seeks this Court’s intervention to compel the Defendants to remove any false advertising and misrepresentations made by the Defendants from their websites and from



their advertising, correct all such misrepresentations, disgorge any profits obtained as a result, and reimburse Printfly's costs and reasonable attorneys' fees to obtain such relief.

### **JURISDICTION AND VENUE**

18. This Court has subject matter jurisdiction over this matter pursuant to 42 Pa. C.S.A. § 931(a) and has personal jurisdiction over Defendants pursuant to 42 Pa.C.S.A. § 5322 because Defendants sell and ship products for pecuniary gain in this Commonwealth, and Defendants direct advertisements, including the false and misleading advertisements at issue herein to Pennsylvania customers.

19. Venue is proper in the Philadelphia County Court of Common Pleas under Rules 1006 and 2179 of the Pennsylvania Rules of Civil Procedure as Printfly and TDR are located in Philadelphia County, the conduct alleged herein is directed to consumers in Philadelphia County, and Defendants regularly conduct business in Philadelphia County.

### **FACTS COMMON TO ALL COUNTS**

20. The resale of blank apparel is viewed in the industry as a "commodity" business because, regardless of retailer, individual blank apparel products are the same throughout the industry.

21. By way of example only, irrespective of where a customer purchases the Gildan "G500" t-shirt, the product, colors, and quality will be the same. Assuming the t-shirt is genuine, a small Red G500 purchased from the Plaintiff or from the Defendants will match every other small Red G500 available for sale online in size and color.

22. As a result, a customer seeking to purchase a G500 t-shirt online will seek out the cheapest supplier and make purchase decisions based on a retailer's representations about price, shipping cost, and speed of delivery.

23. Jiffy holds itself out as a leading online reseller of blank apparel, selling approximately ten times as much product as its nearest competitor through its website [www.jiffyshirts.com](http://www.jiffyshirts.com) (Jiffy’s “Blanks Website”).

24. However, Jiffy’s Blanks Website achieves this success by making countless misrepresentations about the price and quality of their products, creating arbitrary discounts and sale deadlines, and requiring a customer to purchase apparel in different colors and bulk quantities to actually receive the pricing they advertise.

### **Misrepresentations about Price**

25. According to the Blanks Website homepage, the first row of t-shirts is titled the “Cheapest Priced T-Shirts.” (See Blanks Website homepage attached hereto as **Exhibit “B”**).

26. Defendants advertise a yellow “Corn Silk” colored Gildan G500 for sale for \$1.62.

27. When a customer clicks on the t-shirt to purchase it, the customer is directed to a website where the yellow “Corn Silk” colored Gildan G500 costs \$2.67, almost double Defendants’ advertised price. (See G500 Page attached hereto as **Exhibit “C”**).

28. In fact, in order to receive the Gildan G500 for \$1.62, the customer must select a white t-shirt—not the one that Defendants advertise on the Blanks Website homepage.

29. Irrespective of the quantity purchased, a customer is *never* able to achieve a price of \$1.62 for the Gildan G500 in yellow “Corn Silk” color, or any color other than white. See Ex. C.

30. Accordingly, the yellow “Corn Silk” colored Gildan G500 “from \$1.62” is falsely advertised by Defendants on their Blanks Website homepage.

31. Further, the G500 Page indicates that the retail price of the Gildan G500 is \$5.60 and by purchasing from the Blanks Website a customer will “SAVE 71%”. See Ex. C.

32. However, upon information and belief, Defendants don't charge and never have charged \$5.60 for the Gildan G500 and therefore misrepresent the savings that they offer to customers on the Gildan G500.

33. This appears to be the case for the entire row of t-shirts Defendants advertise as their "Cheapest Priced T-Shirts" including but not limited to: the Fruit of the Loom 3931, Gildan G200, and Jerzees 29M. *See* Ex. B.

34. For each of those shirts, a different color than white is advertised.

35. However, when the shirt is actually selected, the price advertised on the Blanks Website homepage can only be achieved if a customer selects the white version of the shirt. (*See* Fruit of the Loom 3931, Gildan G200, and Jerzees 29M pages attached hereto as **Exhibit "D"**).

36. Like the G500, an arbitrarily inflated retail price is listed for each shirt, along with a savings percentage indicating that the customer is obtaining savings of approximately 70%, despite Defendants never actually charging the stated retail price, and never actually providing a customer with the advertised savings.

37. Additionally, like the G500, irrespective of bulk discount applied, the advertised price for each shirt can never be achieved unless a white version of the t-shirt is purchased by the customer.

38. Upon information and belief, this conduct is rampant throughout Defendants' Blanks Website and is not solely limited to the "Cheapest Priced T-Shirts" section of the website.

39. By way of limited example only, Plaintiff selected a Bella+Canvas 3650 t-shirt that is advertised as costing \$5.29 under the "Softest Unisex T-Shirts" category. (*See* Bella Shirts Page attached hereto as **Exhibit "E"**).

40. Despite listing the t-shirt for \$5.29, when selected, the shirt costs \$7.40 each, unless the customer purchases in excess of \$80 in product from the Blanks Website. *See* Ex. E.

41. Moreover, the retail price of the shirt is listed as \$12.18 and the customer is purportedly saving 57% by purchasing it through the website. *See* Ex. E.

42. Upon information and belief, Defendants never sold the Bella+Canvas 3650 shirt for \$12.18.

43. Further, unless a customer purchases in excess of \$80 of apparel, Defendants' "savings" math is incorrect and the savings from the \$12.18 artificially inflated retail price to the \$7.40 cost of one t-shirt is less than 40%.

44. Accordingly, Defendants make material misrepresentations of price, discount, savings, and potential savings throughout their website.

45. Upon information and belief, Defendants know that they are making misrepresentations about price, and nevertheless knowingly and purposely make misrepresentations to that effect.

46. Defendants' conduct is likely to cause confusion to customers and to harm the retail apparel industry as a whole.

47. Further, Defendants' conduct is harmful to other companies in the apparel retail industry including Printfly's recently acquired subsidiary TDR.

**Defendants' T-Shirts are not the Cheapest Priced**

48. When searching Google for "jiffyshirts" the Blank Website's description claims that "JiffyShirts.com has the lowest prices fastest delivery." (*See* Google Search Results attached hereto as **Exhibit "F"**).

49. Further, the first row of shirts on the Blanks Website states that the shirts are the “Cheapest Priced.” See Ex. B.

50. Additionally, Defendants’ paid advertisements on Google represent to the public that Defendants that their products are “Always In Stock”, that they have “The Fastest Delivery” and that they have the “Cheapest Prices” / “Lowest Prices”. (See Examples of Defendants’ Paid Google Ads attached hereto as **Exhibit “S”**).

51. Upon a cursory review of Defendants’ website it is obvious that their products are not always in stock.

52. Further, upon information and belief Defendants’ delivery is not faster than the rest of the industry and Defendants do not have any evidence that their delivery is in fact the “fastest.”

53. More importantly, Defendants don’t have the “lowest prices”, “cheapest prices”, and they are not in fact the “Cheapest Priced” when taking into account all costs that the Defendants pass on to the customer.

54. By way of example only, if a customer wants to purchase one white Gildan G500 t-shirt, the total cost is **\$8.52**, which includes the \$1.62 cost of the shirt, \$5.95 in shipping, \$0.12 in sales tax, and a \$0.83 Processing Tax Fee (that is more than 6x the actual sales tax). (See G500 Order Summary attached hereto as **Exhibit “G”**).

55. Although Printfly’s RushOrderTees.com (“ROT”) website is not a competitor of Jiffy, and is not geared towards the resale of blank apparel, it is possible to purchase a blank t-shirt through the website by not creating a design in the design studio (or skipping the design part of the process) and proceeding to check out. (See ROT Order Summary attached hereto as **Exhibit “H”**).

56. A white Gildan G500 t-shirt can be purchased for \$4.45, including tax and shipping costs from ROT—approximately half of Defendants’ price. *See* Ex. H.

57. By way of additional example only, a company that is in fact Defendants’ competitor, CheapesTees.com has the same shirt including tax and shipping costs for a total of \$5.92. (*See* CheapesTees.com screenshot attached hereto as **Exhibit “I”**).

58. To the extent that Defendants claim that their “Cheapest Priced” and “lowest prices” claims pertain solely to the cost of the shirt, exclusive of fees, shipping costs, and taxes, by way of example only, another one of Defendants’ competitors, ShirtMax.com has the same shirt prices for \$1.59, also cheaper than Jiffy. (*See* ShirtMax.com screenshot attached hereto as **Exhibit “J”**).

59. Accordingly, it is obvious that the Defendants’ products are not the “Cheapest Priced” and that Defendants don’t offer the “lowest prices” and Defendants’ claims to the contrary are misrepresentations.

60. Upon information and belief, Defendants know that their products are not the cheapest priced, and nevertheless knowingly and purposely make misrepresentations to that effect.

61. Defendants’ conduct is likely to cause confusion to customers and to harm the retail apparel industry as a whole.

62. Further, Defendants’ conduct is harmful to other companies in the apparel retail industry including Printfly’s recently acquired subsidiary TDR.

### **Misrepresentations about Quality**

63. The second row of t-shirts is titled the “Best Quality T-Shirts.” *See* Ex. B.

64. However, there is no basis from which Defendants can claim that those four shirts are in fact the best quality.

65. In fact, one of the shirts, the Alternative AA1070 has a five-star rating, but only has one review. *See* Ex. B.

66. Moreover, the Gildan G500 t-shirt, which is listed as Defendants' "cheapest" t-shirt has the same four-and-one-half star rating as the rest of the shirts in the "Best Quality" row, but has over seventeen thousand reviews, a fraction of the reviews for the others. *See* Ex. B.

67. Accordingly, Defendants' claim that those shirts are the "Best Quality" is unsubstantiated, misleading, and a misrepresentation.

68. Instead, upon information and belief, the shirts that Defendants claim are the "Best Quality" provide an increased profit margin for the Defendants and are knowingly mislabeled to convince consumers to purchase them over cheaper versions of the same or similar quality shirts.

69. Defendants' Blanks Website has countless other such misrepresentations of quality including "Softest Cotton," "Most Fashionable," "Best Men's Performance Products," "Best Women's Performance Products," and "Best Women's Sweatshirts."

70. Upon information and belief, these labels are used specifically to increase Defendants positioning within search engines and confuse customers into purchasing what is essentially a commodity good.

71. Upon information and belief, Defendants are aware that the representations are not factually accurate, and nevertheless knowingly and purposely make the misrepresentations to deceive consumers.

72. Defendants' conduct is likely to cause confusion to customers and to harm the retail apparel industry as a whole.

73. Further, Defendants' conduct is harmful to other companies in the apparel retail industry including Printfly's recently acquired subsidiary TDR.

### **Misrepresentations about Sales and Discounts**

74. According to the “Bulk Discounts” page on the Blanks Website, Defendants offer free shipping for orders \$49 and over and bulk discounts for orders over \$80. (*See* Bulk Discounts Page attached hereto as **Exhibit “K”**).

75. Defendants represent that the free shipping sale ends on September 30, 2019, at which point it reverts to free shipping only for orders over \$150. *See* Ex. K.

76. Additionally, the bulk discount has regular discount percentages crossed out in lieu of an increased discount for orders over \$250. *See* Ex. K.

77. However, upon review of two archived versions of the page it is obvious that neither the free shipping sale, nor the bulk discount sale ever expire.

78. In fact, in two pages, one from August 2017 and one from June 2017, Defendants had the exact same sales, purporting to expire at the end of August 2017 and June 2017. (*See* Archived Bulk Discounts Pages attached hereto as **Exhibit “L”**).

79. Upon information and belief Defendants’ sales never expire, Defendants never charged shipping for orders between \$60 and \$150, and never actually charged customers the bulk discounts that are crossed out on the “Bulk Discounts” page.

80. Separately, according to Defendants’ page, the bulk discounts are applied automatically.

81. However, Defendants’ discounts and discount calculations are inaccurate because countless items on their website do not actually receive the advertised discount.

82. By way of example only, for a \$1,620.00 order of 1000 Gildan G500 t-shirts in white, the customer does not receive the 22% discount or any discount, irrespective of the quantity purchased. (*See* 1000 Gildan G500 Order Summary attached hereto as **Exhibit “M”**).



83. Further, for a \$1,001.25 order of 375 Gildan G500 t-shirts in “Corn Silk” yellow, the discount is only \$191.25, or 19.1% -- instead of the advertised 21% discount. (See 375 Gildan G500 in “Corn Silk” yellow Order Summary attached hereto as **Exhibit “N”**).

84. Accordingly, Defendants’ representations about expiring sales, bulk discount rates, and automatically applied discounts are misrepresentations to the consumer.

85. Upon information and belief, Defendants’ conduct and misrepresentations are knowing, purposeful, and done for the purpose of funneling customers into products that are the most profitable for the Defendants.

86. Defendants’ conduct is likely to cause confusion to customers and to harm the retail apparel industry as a whole.

87. Further, Defendants’ conduct is harmful to other companies in the apparel retail industry including Printfly’s recently acquired subsidiary TDR.

### **Misrepresentations about Exclusivity**

88. According to the Blanks Website’s “Contact Us” page, customers can “find the following **Only** at JiffyShirts.com!” (emphasis added):

- **Show all the product information we have.** That includes images, sizing information, descriptions, materials, material weight, and color samples.
- **Complete inventory information.** Don't worry about out-of-stock items or substitutions. We show which products are good for small or bulk orders. We won't sell what we don't have.
- **Shipping and delivery dates.** No unclear "usually ships", "shipping today" on a Sunday, or special shipping conditions. We check our warehouses and automatically ship the order to you as fast as possible at no extra charge.
- **Fastest shipping at no extra charge.** Don't pay more for Next Day shipping. We don't even have to offer this service. We use our national network of 10 warehouses to provide fast deliveries at UPS Ground rates.
- **Free or cheap shipping.** Just enter your address. We clearly show free or the cheap flat-rate shipping fee on the cart page. You do not need to create an account or give personal information first.
- **We won't change your order.** We never backorder, remove out-of-stock items and ship the rest, or substitute items. We show inventory information so you can buy what we have in stock.
- **Automatic bulk discounting.** You don't have to call and bargain hoping to get a fair price. We automatically give the maximum discount on bulk orders to all customers.
- **Tracking info emailed on the shipping day.** Don't worry about your package. We send the tracking information automatically.

- **We do not keep your credit card information.** Safer than phone or fax orders. We don't want people to see our information, why would you? Our staff never sees your complete credit card information. To protect you from hackers, we use advanced security. Once your order is complete, we delete this information from our system. For your protection, you must enter this private information for every order.
- **We respect and protect your privacy.** We never share your information. We delete all we can after shipping. We never harass you with junk email.

89. However, Defendants are clearly not the only business entity in the apparel retail space that, by way of limited example only, shows all product information, shipping and delivery dates, free or cheap shipping, won't change orders, provide tracking info on the shipping day, and respects their consumers' privacy.

90. By way of example only, Defendants claim that they are the only company that offers "complete inventory information."

91. However, in addition to not providing "complete" inventory information, and maxing out their inventory numbers at 999 (unlike many of their competitors), Defendants ignore the fact that this feature appears on most blank apparel retailers as the data is made available to all blank apparel resellers by the blank apparel suppliers.

92. Defendants make other similar "only JiffyShirts.com" claims throughout the Blanks Website. By way of additional example, Defendants claim that "only JiffyShirts.com will provide a free return shipping label for your unwanted items!" *See* Ex. K.

93. However, TDR, and many other companies in the blank apparel industry provide free return shipping label for unwanted items.

94. Additionally, despite not owning any warehouses, Defendants claim that they check "our" warehouses for shipping and delivery dates, leading consumers to believe that they have physical locations, when in fact the company does not even list a physical address on its website—only a P.O. box.

95. Defendants make this misrepresentation about owning or possessing warehouses throughout their website, when in fact these are the same warehouses that serve most of the industry. Such misrepresentations include, checking “our 3 closest warehouses ... Only at JiffyShirts.com!” and Defendants claim that they “invested in shipping quickly through our national warehouse network.” *See* Ex. K.

96. In doing so, Defendants make the false claim that their customers get “orders the fastest and cheapest with JiffyShirts.com”

97. Accordingly, Defendants’ representations about their business and exclusivity in the industry regarding common services provided by other companies in the industry, including TDR, are misrepresentations to the consumer.

98. Upon information and belief, Defendants conduct and misrepresentations are knowing, purposeful, and done for the purpose of misleading consumers into believing that certain services are available “only at JiffyShirts.com.”

99. Defendants’ conduct is likely to cause confusion to customers and to harm the retail apparel industry as a whole.

100. Further, Defendants’ conduct is harmful to other companies in the apparel retail industry including Printfly’s recently acquired subsidiary TDR.

### **Fake Reviews**

101. Upon information and belief the reviews on Jiffy’s Blanks Website are not genuine.

102. Upon cursory review of the Gildan G500 reviews, it appears that the review pages are static, pre-created and many of the Gildan G500 reviews are from the same individuals and contain the same or substantially the text. However, those reviews appear on different days.

103. By way of example only, on page 300 of the reviews, “Deborah” left **eight** reviews, all of which have a title of “Awesome!” and a comment of “Awesome!” Those reviews occur on six separate dates from December 2016 through October 2017. (See Page 300 of the G500 reviews attached hereto as **Exhibit “T”**).

104. By way of additional example, on page 303 of the reviews, “Deborah” left **twelve** reviews, that all have a title of “Awesome” and a comment of “Awesome”. (See Page 303 of the G500 reviews attached hereto as **Exhibit “U”**).

105. Notably, despite over seventeen thousand (17,000) reviews for the Gildan G500, there is not a single one-star or two-star review.

106. Plaintiff repeated this process for various items on Defendants’ Blanks Website, navigated to the last pages of reviews, and found countless names leaving dozens of reviews with the same or substantially the same titles and comments, including but not limited to: “Ardeart” “Ulisses” “Rodanica” “Jose” “Maria” “Angela” “J” dating back to the end of 2016 / beginning of 2017.

107. Upon information and belief, Defendants knowingly and purposely created these fake reviews themselves in an effort to game and deceive search engine results with keywords relating to the product and misrepresentations about quality for their best selling and/or most profitable products.

108. Upon information and belief, such fake review practices are rampant throughout the website and have contributed to the websites success dating back to end of 2016 / beginning of 2017.

109. Jiffy operates a second website which was formerly hosted at [www.dekeo.com](http://www.dekeo.com) but has been moved to [www.jiffyshirts.com/print](http://www.jiffyshirts.com/print).

110. That website purports to be an online marketplace of apparel decorators (“Marketplace Website”) that perform the same tasks and services as ROT. (*See* screenshot of decorators on the Marketplace Website attached hereto as **Exhibit “O”**).

111. When Defendants were preparing to launch the Marketplace Website they contacted Printfly’s flagship website, ROT, to be one of the decorators on the website, but Printfly declined to participate.

112. When Defendants launched the website, listing more than 50 decorators, the decorators appeared to have reviews almost instantly. *See* Ex. O.

113. This was suspicious because the Marketplace Website provides no method by which a customer could actually leave a review for a decorator.

114. Upon closer inspection, it appears that the reviews are almost all five-stars and created on or about the same day for each decorator.

115. By way of limited example only, all sixteen reviews for “Kirkwood Trading Company” are five-star reviews and were all created on June 25, 2019. (*See* Kirkwood reviews page attached hereto as **Exhibit “P”**).

116. By way of additional example, all fifteen reviews for “Teeth Like Swords Printing” are five-star reviews, and fourteen of the fifteen reviews were created on July 19, 2019 (the fifteenth was created on July 20, 2019). (*See* Teeth Like Swords reviews page attached hereto as **Exhibit “Q”**).

117. By way of additional example, all twelve reviews for “Paper Root Printing Co” were created on July 5, 2019, and eleven of the twelve reviews are five-star reviews (the twelfth is a four star review). (*See* Paper Root Reviews page attached hereto as **Exhibit “R”**).

118. Notably, there were no reviews for any of those companies before or after the date on which all of the reviews were posted on the Marketplace Website.

119. Upon information and belief, Defendants created fake reviews to falsely attribute quality to their Marketplace Website and create confusion about the apparel decorators they market.

120. Such conduct is likely to harm other apparel decorators, including Printfly's flagship company, ROT.

121. To the extent that Defendants created fake reviews for their Marketplace Website, they also knowingly and purposely made misrepresentations of fact about the products and product offerings on their website.

#### **Solicitation Using Converted Confidential Lists**

122. Separately, upon information and belief, Defendants Decorated Apparel Business has solicited and continues to solicit decorators seeking to compete with ROT from a proprietary and confidential list that was unlawfully obtained by one of Defendants' executive level employees, Buchanan from his prior employer Alpha.

123. Additionally, upon information and belief, Defendants are soliciting customers for their Marketplace Website from this proprietary and confidential list as well.

124. Upon information and belief, Defendants' CEO, Serflek knew or should have known that Buchanan unlawfully retained the list and that Buchanan was soliciting from an unlawfully obtained list, but nevertheless instructed and/or allowed him to proceed.

125. The use of this list has granted Defendants access to decorators and customers' contact information that they wouldn't otherwise possess and enabled them to build and market their Decorated Apparel Business much faster than they would have been able to otherwise.

126. Defendants ability to obtain in excess of 50 decorators in a short period of time for their Decorated Apparel Business, in reliance on unlawfully retained customer information amounts to unfair competition and has caused and/or is likely to cause harm to competition in the apparel industry, including to the Plaintiff.

**COUNT I**  
**(FALSE AND DECEPTIVE ADVERTISING – LANHAM ACT 15 U.S.C. § 1125(a)(1)(B))**  
**PRINTFLY v. ALL DEFENDANTS**

127. Plaintiff incorporates all preceding paragraphs as though set forth fully herein.

128. The Lanham Act’s relevant section provides:

Any person who, on or in connection with any goods or services, or any container for goods, uses in commerce any word, term, name, symbol, or device, or any combination thereof, or any false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which ... in commercial advertising or promotion, misrepresents the nature, characteristics, qualities, or geographic origin of his or her or another person's goods, services or commercial activities, shall be liable in a civil action by any person who believes that he or she is or is likely to be damaged by such act.

15 U.S.C. § 1125(a)(1)(B).

129. As described above, Defendants have engaged in various acts of false advertising and deceptive trade practices regarding their products, including without limitation, (i) using bait and switch pricing tactics; (ii) falsely claiming that they offer the “cheapest” products; (iii) misrepresenting the quality of their products as the “best” products; (iv) continuously running the same artificial promotions; and (v) misrepresenting retail pricing and bulk order discounts.

130. Defendants’ false and misleading representations have deceived and/or have a tendency to deceive a substantial portion of customers seeking to purchase blank and decorated apparel.

131. Defendants' false and misleading representations regarding price, quality, expiring promotions, and bulk order discounts are material and likely to influence purchase decisions.

132. Defendants' false and misleading representations have caused and/or are likely to cause consumer confusion, mistake, or deception as to the quality, accuracy, and legitimacy of Defendants' products and information about those products.

133. Defendants' operation of an online retail website resulted in the goods traveling in interstate commerce.

134. There is a likelihood of injury to Plaintiff's subsidiary TDR and other apparel retailers in the blank and decorated apparel space resulting from Defendants' conduct.

135. Upon information and belief, Defendants' unlawful conduct, which dates back to at least 2016 has helped propel Defendants in the resale of blank apparel space at the expense of other companies in the industry.

136. The ongoing acts of Defendants constitute false and deceptive advertising in violation of Section 43(a)(1)(B) of the Lanham Act, 15 U.S.C. § 1125(a)(1)(B).

137. Issuance of injunctive relief is justified by Defendant's conduct, is needed to avert irreparable harm, is justified by the balance of the equities, and is in the public interest.

138. Pursuant to 15 U.S.C. § 1117(a), Plaintiff is entitled to an Order requiring Defendants to account for any and all profits and other ill-gotten gains Defendants derived from their misrepresentations as to the nature, characteristics and qualities of its goods and services in commercial advertising and promotion, and to an Order awarding all damages sustained by reason of Defendants' conduct.

139. Defendants' actions have been willful, malicious and fraudulent, with knowledge of the likelihood of deception, and with intent to deceive.



140. Pursuant to 15 U.S.C. § 1117(a), Plaintiff is entitled to recover multiplied or enhanced damages.

141. This is an “exceptional case” under 15 U.S.C. § 1117(a), and therefore Plaintiff is entitled to an award of attorneys’ fees and costs.

**WHEREFORE**, Printfly requests a judgment in its favor against Defendant including a finding that Defendants willfully engaged in false advertising in violation of the Lanham Act, causing harm in excess of \$50,000, including but not limited to disgorgement of all profits realized by Defendants as a result of its unfair competition and false advertising, plus, to the extent available, an award of treble damages of three times the amount of Defendants’ illicit profits, and reasonable attorneys’ fees and costs, along with pre-judgment interest, and injunctive relief compelling Defendants to remove from public view any and all such false advertising, together such other relief as the Court deems equitable and just.

**COUNT II**  
**(FALSE AND DECEPTIVE ADVERTISING – LANHAM ACT 15 U.S.C. § 1125(a)(1)(A))**  
**PRINTFLY v. ALL DEFENDANTS**

142. Plaintiff incorporates all preceding paragraphs as though set forth fully herein.

143. The Lanham Act’s relevant section provides:

Any person who, on or in connection with any goods or services, or any container for goods, uses in commerce any word, term, name, symbol, or device, or any combination thereof, or any false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which ... is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of such person with another person, or as to the origin, sponsorship, or approval of his or her goods, services, or commercial activities by another person, or, shall be liable in a civil action by any person who believes that he or she is or is likely to be damaged by such act.

15 U.S.C. § 1125(a)(1)(A).

144. As described above, Defendants have made false or misleading representations of fact and quality in the reviews on their Blanks Website and on their Decorative Website by creating and posting fake reviews on their website.

145. Defendants' false and misleading representations have deceived and/or have a tendency to deceive a substantial portion of customers seeking to decorated apparel and have, upon information and belief, deceived search engines (including Google) resulting in higher positioning in search results.

146. Defendants' false and misleading representations are likely to influence purchase decisions.

147. Defendants' false and misleading representations have caused and/or are likely to cause consumer confusion, mistake, or deception as to the quality, accuracy, and legitimacy of Defendants' products and information about those products.

148. Defendants' operation of an online retail website resulted in the goods traveling in interstate commerce.

149. There is a likelihood of injury to Plaintiff's flagship brand ROT, subsidiary TDR and other apparel retailers in the blank and decorated apparel space resulting from Defendants' conduct.

150. Upon information and belief, Defendants' unlawful conduct, which dates back to at least 2016 has helped propel Defendants in the resale of apparel space at the expense of other companies in the industry.

151. The ongoing acts of Defendants constitute false and misleading representations of fact relating to the approval of Defendants' goods in violation of Section 43(a)(1)(A) of the Lanham Act, 15 U.S.C. § 1125(a)(1)(A).

152. Issuance of injunctive relief is justified by Defendant's conduct, is needed to avert irreparable harm, is justified by the balance of the equities, and is in the public interest.

153. Pursuant to 15 U.S.C. § 1117(a), Plaintiff is entitled to an Order requiring Defendants to account for any and all profits and other ill-gotten gains Defendants derived from their misrepresentations and to an Order awarding all damages sustained by reason of Defendants' conduct.

154. Defendants' actions have been willful, malicious and fraudulent, with knowledge of the likelihood of deception, and with intent to deceive.

155. Pursuant to 15 U.S.C. § 1117(a), Plaintiff is entitled to recover multiplied or enhanced damages.

156. This is an "exceptional case" under 15 U.S.C. § 1117(a), and therefore Plaintiff is entitled to an award of attorneys' fees and costs.

**WHEREFORE**, Printfly requests a judgment in its favor against Defendant including a finding that Defendants willfully engaged in false advertising in violation of the Lanham Act, causing harm in excess of \$50,000, including but not limited to disgorgement of all profits realized by Defendants as a result of its unfair competition and false advertising, plus, to the extent available, an award of treble damages of three times the amount of Defendants' illicit profits, and reasonable attorneys' fees and costs, along with pre-judgment interest, and injunctive relief compelling Defendants to remove from public view any and all such false advertising, together such other relief as the Court deems equitable and just.

**COUNT III**  
**(PENNSYLVANIA COMMON LAW UNFAIR COMPETITION)**  
**PRINTFLY v. ALL DEFENDANTS**

157. Plaintiff incorporates all preceding paragraphs as though set forth fully herein.

158. Pennsylvania's common law cause of action for unfair competition mirrors the Lanham Act's cause of action for unfair competition, except that under state law, there is no requirement that the goods traveled through interstate commerce. *See Louis Vuitton Malletier & Oakley, Inc. v. Veit*, 211 F.Supp.2d 567, 582 (E.D. Pa. 2002), amended (June 28, 2002).

159. As set forth above, Defendants have made material misrepresentations of fact and have engaged in deceptive trade practices regarding their products, including without limitation, (i) using bait and switch pricing tactics; (ii) falsely claiming that they offer the "cheapest" products; (iii) misrepresenting the quality of their products as the "best" products; (iv) continuously running the same artificial promotions; (v) misrepresenting retail pricing and bulk order discounts; and (vi) posting fake reviews on their websites.

160. Defendants' false and misleading representations have deceived and/or have a tendency to deceive a substantial portion of customers seeking to purchase blank and decorated apparel.

161. Defendants' false and misleading representations have deceived and/or have a tendency to deceive search engine results and falsely attribute quality and priority to Defendants' search engine listings.

162. Defendants' false and misleading representations regarding price, quality, expiring promotions, and bulk order discounts are material and likely to influence purchase decisions.

163. Defendants' false and misleading representations have caused and/or are likely to cause consumer confusion, mistake, or deception as to the quality, accuracy, and legitimacy of Defendants' products and information about those products.

164. Defendants conduct is aimed at diverting business from other companies in the blank and decorated apparel industry, including Plaintiff, by means of fraudulent misrepresentations and misleading advertising.

165. There is a likelihood of injury to Plaintiff's flagship brand, ROT and Plaintiff's subsidiary TDR and other apparel retailers in the blank and decorated apparel space resulting directly from Defendants' conduct.

166. Upon information and belief, Defendants' unlawful conduct, which dates back to at least 2016 has helped propel Defendants in the resale of apparel space at the expense of other companies in the industry.

167. Defendants' engaged in such deceptive and misleading conduct in an effort to increase sales of its products.

168. Defendants have made and continue to make substantial profits as a result of their deceptive and misleading conduct.

169. Defendants' conduct is improper, unlawful, and in violation of Pennsylvania Common Law relating to unfair competition and misleading advertising.

170. Defendants' conduct is knowing, purposeful, and reckless and justifies the imposition of exemplary damages.

171. Plaintiff has no adequate remedy at law and are entitled to preliminary and permanent injunctive relief.

**WHEREFORE**, Printfly requests a judgment in its favor against Defendant including a finding that Defendants willfully engaged in fraudulent misrepresentations about their business and misleading advertising under the Pennsylvania Unfair Competition Act, causing harm in excess of \$50,000, including but not limited to disgorgement of all profits realized by Defendants

as a result of its misrepresentations and misleading statements, plus, to the extent available, exemplary damages, Plaintiff's attorneys' fees and costs incurred in bringing and maintaining this action, along with pre-judgment interest, and injunctive relief compelling Defendants to remove from public view any and all such misrepresentations and misleading advertising, together such other relief as the Court deems equitable and just.

Respectfully Submitted,

**BOCHETTO & LENTZ, P.C.**

Date: January 15, 2020

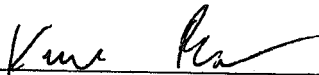
By: \_\_\_\_\_

  
Anton Kaminsky, Esquire  
*Attorney for Plaintiff*

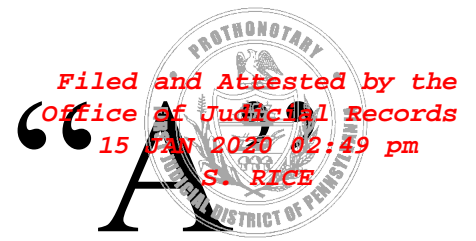
**VERIFICATION**

I, Kane Posner, hereby verify that the statements made in the foregoing *Amended Complaint* are true and correct to the best of my knowledge, information and belief. I am aware that false statements of fact made knowingly are subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

September 23, 2019  
Date

  
Kane Posner, Executive Vice President  
Printfly Corporation

# EXHIBIT





# WORK PRODUCT REDACTION

----- Forwarded message -----

From: **JiffyShirts.com Orders** <[orders@jiffyshirts.com](mailto:orders@jiffyshirts.com)>

Date: Fri, May 17, 2019 at 4:26 PM

Subject: Order 22649958 Confirmation

To: <[glentz@bochettoandlentz.com](mailto:glentz@bochettoandlentz.com)>



## Order Confirmation

Order 22649958

Hi Gavin,

Thank you for shopping with JiffyShirts.com! Here is your order summary.

### Shipping Address:

Gavin Lentz  
1524 Locust St  
PHILADELPHIA , PA 19102

### Billing Address:

Gavin Lentz  
1524 Locust St  
PHILADELPHIA , PA 19102

### Your Order

Product Total:	\$7.63
Shipping:	\$7.95
<b>Total:</b>	<b>\$15.58</b>

<b>Order #:</b>	<b>22649958</b>
Order Date:	Fri, May 17, 2019
Payment:	American Express XXXX-XXXX-XXXX-7001
Shipping:	UPS Ground
Delivery:	Mon, May 20, 2019

**Delivery: Arriving Mon, May 20, 2019**

### Unisex Triblend Short-Sleeve T-Shirt

Teal Triblend  
L

BELLA+CANVAS  
LOS ANGELES  
3413C

**\$7.63**

**1**

**\$7.63**

Case ID: 190509004



Please inspect your delivered order.  
Claims for missing, wrong, or damaged items must be made within  
3 days of final delivery (by Thu, May 23, 2019).  
Returns within 45 days (by Mon, July 1, 2019).



Return, Refunds & Exchanges  
[Read More](#)



Have a Question?  
[Contact Us](#)

Copyright 2004-2019 JiffyShirts.com

--  
**Gavin P. Lentz, Esquire**  
Bochetto & Lentz P.C.  
[1524 Locust St.](#)  
[Philadelphia, PA 19102](#)  
215-735-3900  
[www.bochettoandlentz.com](http://www.bochettoandlentz.com)

# WORK PRODUCT REDACTION

Begin forwarded message:

**From:** "JiffyShirts.com Orders" <[orders@jiffyshirts.com](mailto:orders@jiffyshirts.com)>  
**Date:** May 17, 2019 at 7:05:49 PM EDT  
**To:** [glentz@bochettoandlentz.com](mailto:glentz@bochettoandlentz.com)  
**Subject:** Shipment for Order 22649958



## Shipment Confirmation

Order 22649958

Hi Gavin,

Shipment for Order# 22649958 has shipped from our warehouse. The details are below.

### Shipment Details

**Shipping To:**

Gavin Lentz  
[1524 Locust St](#)  
PHILADELPHIA, PA  
19102 4401

**Shipping:**

UPS Ground

**Tracking:**

1ZA82T890307894968

[View Tracking Information](#)

**Delivery:** Arriving Mon, May 20, 2019

### Unisex Triblend Short-Sleeve T-Shirt

Teal Triblend  
L

BELLA+CANVAS  
LOS ANGELES  
3413C

Case ID: 190509004

**\$7.63****1****\$7.63**

Please inspect your delivered order.  
Claims for missing, wrong, or damaged items must be made within  
3 days of final delivery (by Thu, May 23, 2019).  
Returns within 45 days (by Mon, July 1, 2019).



Return, Refunds & Exchanges  
[Read More](#)



Have a Question?  
[Contact Us](#)

Copyright 2004-2019 [JiffyShirts.com](http://JiffyShirts.com)

# WORK PRODUCT REDACTION

Begin forwarded message:

**From:** "JiffyShirts.com Orders" <[orders@jiffyshirts.com](mailto:orders@jiffyshirts.com)>  
**Date:** May 21, 2019 at 1:46:12 AM EDT  
**To:** [glentz@bochettoandlentz.com](mailto:glentz@bochettoandlentz.com)  
**Subject:** Your shipment was delivered! Jiffyshirts Order 22649958



## Shipment Delivered

Order 22649958

Hi Gavin,

Delivery for Order# 22649958 was delivered.

RECEIVED AT: Mon, May 20, 2019 4:23 PM EDT

Thanks for shopping with [JiffyShirts.com](http://JiffyShirts.com)!

### Shipment Details

#### Shipping To:

Gavin Lentz  
[1524 Locust St](#)  
PHILADELPHIA, PA  
19102 4401

#### Shipping:

UPS Ground

#### Tracking:

1ZA82T890307894968

[View Tracking Information](#)

**Delivery:** Delivered Mon, May 20, 2019

Unisex Triblend Short-Sleeve T-Shirt

Case ID: 190509004



Teal Triblend  
L

BELLA+CANVAS  
LOS ANGELES  
3413C

**\$7.63**

**1**

**\$7.63**

Please inspect your delivered order.  
Claims for missing, wrong, or damaged items must be made within  
3 days of final delivery (by Thu, May 23, 2019).  
Returns within 45 days (by Mon, July 1, 2019).  
[Return Items](#)



Return, Refunds & Exchanges  
[Read More](#)



Have a Question?  
[Contact Us](#)

Copyright 2004-2019 [JiffyShirts.com](#)

# EXHIBIT “B”



Search for products



Sign In

Your Orders

Contact Us



View Cart

T-SHIRTS SWEATSHIRTS POLOS PANTS HATS BAGS MORE

LOWEST  
TOTAL PRICE



BULK DISCOUNT  
AT \$80

FREE SHIPPING  
AT \$59 \$49

ORDER BY 6PM  
SHIPS TODAY

FREE  
RETURNS

DELIVERY DATE  
IN CART

19102 (change)

Delivery In

- 1 day
- 2 days
- 3 days

Category

- T-Shirts (803)
- Women's Shirts (588)
- Sweatshirts (395)
- Jackets (368)
- Hats (298)
- Polo Shirts (285)
- Bags (209)
- Kid's Shirts (156)
- Dress Shirts (153)
- Pants & Shorts (114)
- Household Items (83)
- High Viz (74)
- Accessories (7)

Cut

- Adult (1,123)
- Women (721)
- Men (634)
- Youth (146)
- Infant (32)
- Toddler (28)
- Girl's (13)

Blend

- Solid (2,527)
- Blended (979)





Color

- Black (2,359)
- Navy (1,718)
- Gray (1,720)
- Purple (522)
- Green (1,243)
- Royal (1,092)
- Heather (660)
- Red (1,622)
- Neon (139)
- Yellow (450)
- Blue (1,132)
- White (1,502)
- Khaki (270)
- Orange (443)

## Cheapest Priced T-Shirts

 from <b>\$1.62</b> GILDAN <b>Top Seller</b> <b>Sale</b> ★★★★★ (17386) G500 Adult Unisex Heavy Cotton™ 5.3 oz. T-Shirt	 from <b>\$1.56</b> FRUIT OF THE LOOM <b>Top Seller</b> ★★★★★ (5723) 3931 Adult Unisex 5 oz. HD Cotton™ T-Shirt	 from <b>\$2.10</b> GILDAN <b>Top Seller</b> <b>Sale</b> ★★★★★ (3667) G200 Adult Unisex Ultra Cotton® 6 oz. T-Shirt	 from <b>\$1.99</b> JERZEES <b>Top Seller</b> ★★★★★ (3015) 29M Adult Unisex 5.6 oz. DRI-POWER® ACTIVE T-Shirt
---	--	---	--

## Best Quality T-Shirts

 from <b>\$3.92</b> BELL+CANVAS <b>Soft Feel</b> ★★★★★ (4480) 3001C Unisex Jersey Short-Sleeve T-Shirt	 from <b>\$7.39</b> BELL+CANVAS ★★★★★ (923) 3413C Unisex Triblend Short-Sleeve T-Shirt	 from <b>\$6.57</b> ANVIL ★★★★★ (264) 6750 Adult Unisex Triblend T-Shirt	 from <b>\$3.99</b> ALTERNATIVE ★★★★★ (1) AA1070 Unisex Basic Crew
---	--	---	--

4.8 ★★★★★  
Google  
Customer Reviews



# EXHIBIT “C”



Search for products



Sign In

Your Orders Contact Us



View Cart

T-SHIRTS SWEATSHIRTS POLOS PANTS HATS BAGS MORE

LOWEST  
TOTAL PRICEBULK DISCOUNT  
AT \$80FREE SHIPPING  
AT \$59 \$49ORDER BY 6PM  
SHIPS TODAYFREE  
RETURNSDELIVERY DATE  
IN CART

## Adult Unisex Heavy Cotton™ 5.3 oz. T-Shirt

Rating: ★★★★★

Recommend: 98%

Reviews: 17386

SAVE 71%

Retail  
~~\$6.60~~  
sizes S - XLWhite  
**\$1.62**Gray  
**\$2.54**Color  
**\$2.67**

## BULK BUYERS

Cart Above	White	Gray	Color
\$80	\$1.62	\$2.54	\$2.67
\$150	\$1.62	\$2.54	\$2.67
\$250	\$1.62	\$2.18	\$2.28
\$500	\$1.62	\$2.12	\$2.22
\$1,000	\$1.62	\$2.07	\$2.16
\$1,750	\$1.62	\$2.07	\$2.16
\$3,800	\$1.62	\$2.07	\$2.16

Use Bulk Buyer Order Entry

## 1. Pick Color

Pick Color Corn Silk

## 2. Choose Size &amp; Enter Quantities

~~\$6.60~~  
**\$2.67**

S	M	L	XL
511 in stock	705 in stock	604 in stock	604 in stock

~~\$9.44~~  
**\$5.26**

2XL
604 in stock

~~\$10.88~~  
**\$6.67**

3XL
207 in stock

ADD TO CART

Free Return Shipping  
Try it on. Not for you? Easy Returns.  
Free return shipping labels for the next 45 days.

GILDAN

Model: G500  
Cotton: 100%  
Weight: 5.3 Oz  
Sizes: S, M, L, XL, 2XL, 3XL, 4XL, 5XL

## Features:

- ▶ Classic fit
- ▶ 7/8" collar
- ▶ Quarter-turned to eliminate center crease
- ▶ Safety Green is compliant with ANSI / ISEA 107 high visibility standards
- ▶ Tear-away label
- ▶ Double-needle stitching throughout
- ▶ Taped shoulder-to-shoulder
- ▶ Seamless rib at neck
- ▶ Ash Grey is 99% cotton, 1% polyester
- ▶ Sunset, Safety Pink, Russet, Neon (Green, Blue), Midnight, Lilac, Blackberry, Tweed, Safety Green, S. Orange, Dark Heather, Graphite Heather, and Heather (Military Green, Radiant Orchid, Red, Sapphire) are 50% cotton, 50% polyester
- ▶ Antique (Cherry Red, Jade Dome, Irish Green, Sapphire, Orange) and Sport Grey are 90% cotton, 10% polyester
- ▶ 100% preshrunk cotton

See Matching Products  
See Similar Products

4.8 ★★★★★  
Google  
Customer Reviews

# EXHIBIT “D”







Search for products



Sign in

Your Orders

Contact Us



View Cart

T-SHIRTS SWEATSHIRTS POLOS PANTS HATS BAGS MORE

LOWEST  
TOTAL PRICE



BULK DISCOUNT  
AT \$80

FREE SHIPPING  
AT \$59 \$49

ORDER BY 6PM  
SHIPS TODAY

FREE  
RETURNS

DELIVERY DATE  
IN CART



JiffyShirts.com © 2013

## Adult Unisex Ultra Cotton® 6 oz. T-Shirt

Rating: ★★★★★

Recommend: 98%

Reviews: 3687

SAVE 67%

Retail  
**\$6.42**  
sizes S - XL

White  
**\$2.10**

Gray  
**\$2.24**

Color  
**\$2.77**

BULK BUYERS

Cart Above	White	Gray	Color
\$80	\$2.10	\$2.24	\$2.77
\$150	\$2.10	\$2.24	\$2.77
\$250	\$2.08	\$2.24	\$2.41
\$500	\$2.05	\$2.24	\$2.37
\$1,000	\$2.03	\$2.22	\$2.35
\$1,750	\$2.03	\$2.22	\$2.35
\$3,800	\$2.03	\$2.22	\$2.35

### 1. Pick Color

Pick Color Charcoal

### 2. Choose Size & Enter Quantities

~~\$6.42~~  
**\$2.77**

<b>S</b>	<b>M</b>	<b>L</b>	<b>XL</b>
000+ in stock	000+ in stock	000+ in stock	000+ in stock

~~\$10.02~~  
**\$5.73**

<b>2XL</b>
000+ in stock

~~\$12.59~~  
**\$7.26**

<b>3XL</b>	<b>4XL</b>	<b>5XL</b>
000+ in stock	No Stock	No Stock

ADD TO CART

Free Return Shipping  
Try it on. Not for you? Easy Returns.  
Free return shipping labels for the next 45 days.

Use Bulk Buyer Order Entry

GILDAN

Model: G200  
Cotton: 100%  
Weight: 6 Oz  
Sizes: S, M, L, XL, 2XL, 3XL, 4XL, 5XL

#### Features:

- ▶ Taped neck and shoulders
- ▶ Seamless double-needle 7/8" collar
- ▶ Double-needle sleeve and bottom hem
- ▶ Tear away label
- ▶ Heathers and Safety colors are 50/50
- ▶ Antique colors are 90/10
- ▶ Sport Grey is 90/10
- ▶ Ash Grey is 99/1
- ▶ 6 oz., 100% preshrunk cotton

See Matching Products

See Similar Products

Featured Review

Measurements

This is my favorite brand of shirt to use for heat press transfers

★★★★★ from Scott on Fri, Sep. 22, 2006

4.8 ★★★★★  
Google  
Customer Reviews



Search for products



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View Cart

T-SHIRTS SWEATSHIRTS POLOS PANTS HATS BAGS MORE

LOWEST  
TOTAL PRICEBULK DISCOUNT  
AT \$80FREE SHIPPING  
AT \$59 \$49ORDER BY 6PM  
SHIPS TODAYFREE  
RETURNSDELIVERY DATE  
IN CART

JiffyShirts.com © 2013

## Adult Unisex 5.6 oz. DRI-POWER® ACTIVE T-Shirt

Rating: ★★★★★

Recommend: 97%

Reviews: 3015

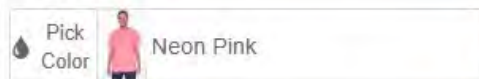
SAVE 67%

Retail  
~~\$6.02~~  
sizes S - XLWhite  
**\$1.99**Gray  
**\$2.46**Color  
**\$2.99**

### BULK BUYERS

Cart Above	White	Gray	Color
\$80	\$1.99	\$2.46	\$2.99
\$150	\$1.99	\$2.46	\$2.99
\$250	\$1.99	\$2.08	\$2.42
\$500	\$1.99	\$2.08	\$2.36
\$1,000	\$1.99	\$2.08	\$2.33
\$1,750	\$1.99	\$2.08	\$2.30
\$3,800	\$1.99	\$2.08	\$2.27

### 1. Pick Color



Use Bulk Buyer Order Entry



### 2. Choose Size & Enter Quantities

~~\$6.02~~  
**\$2.99**

S	M	L	XL
No Stock	500 in Stock	999 in Stock	999 in Stock

~~\$9.94~~  
**\$5.91**

2XL  
No Stock

~~\$12.48~~  
**\$9.14**

3XL  
52 in Stock

~~\$12.48~~  
**\$9.27**

4XL  
282 in Stock

~~\$12.48~~  
**\$9.39**

5XL  
170 in Stock

Model: 29M  
Cotton: 50/50  
Weight: 5.6 Oz  
Sizes: S, M, L, XL, 2XL, 3XL, 4XL, 5XL

#### Features:

- ▶ Tearaway label
- ▶ Seamless body for a wide printing area
- ▶ Seamless 1x1 rib collar
- ▶ Oxford is 53% polyester, 47% cotton
- ▶ Double-needle stitched hemmed sleeves and bottom
- ▶ Shoulder-to-shoulder tape
- ▶ Double-needle coverstitched front neck
- ▶ 50% cotton, 50% polyester

See Matching Products

See Similar Products

Featured Review

Measurements

I have always loved the Jerzees 50/50 T-shirts



from Sharol on Mon, Nov. 16, 2009

4.8 ★★★★★  
Google  
Customer Reviews

# EXHIBIT “E”

Cotton (1,369)  
Certified  
Organic (31)  
Combed  
Ringspun (272)  
Organic (51)  
Preshrunk (208)  
Recycled (27)  
Ringspun (237)  
USA  
Certified (10)  
Denim (17)  
Lycra (11)  
Nylon (45)  
PVC (3)  
Performance (193)  
Polyester (1,640)  
Rayon (133)  
Spandex (236)

#### Thickness

Light (under 5oz)  
(2,718)  
Regular (5-6oz) (5)  
Heavy (over 6oz)  
(3)

#### Size

One Size (561)  
XXS (14)  
XS (717)  
XS/S (21)

Adult Unisex 5.2 oz., 50/50 T-Shirt  
Unisex 5.2 oz., 50/50 T-Shirt  
Adult Unisex 5.2 oz., ComfortSoft® Cotton T-Shirt  
Adult Unisex 5.2 oz., EcoSmart® T-Shirt

### Softest Unisex T-Shirts



from **\$2.74** ANVIL

Top Seller Soft Feel

★★★★★ (2364)

980

Lightweight T-Shirt



from **\$5.29** BELLA+CANVAS

★★★★★ (546)

3650

Unisex Poly-Cotton Short-Sleeve T-Shirt



from **\$2.88** FRUIT&LOOM

★★★★★ (155)

SF45R

Adult Unisex 4.7 oz. Sofspun® Jersey Crew T-Shirt



from **\$5.29**

★★★★★ (81)

102A

Unisex Triblend Short-Sleeve T-Shirt

### Safetywear





Search for products

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Your Orders Contact Us



T-SHIRTS SWEATSHIRTS POLOS PANTS HATS BAGS MORE

LOWEST TOTAL PRICE >> BULK DISCOUNT IN EFFECT FREE SHIPPING FOR THIS ORDER ORDER BY 6PM SHIPS TODAY FREE RETURNS DELIVERY DATE IN CART



### Unisex Poly-Cotton Short-Sleeve T-Shirt

Rating: ★★★★★ Recommend: 97% Reviews: 546

SAVE 57%

Retail  
~~\$12.18~~  
sizes XS - XL

All Colors  
**\$5.29**

BULK BUYERS

Cart Above

All Colors

\$80	\$5.29
\$150	\$5.29
\$250	\$5.00
\$500	\$4.92
\$1,000	\$4.76
\$1,750	\$4.44
\$3,800	\$4.44

#### 1. Pick Color

Pick Color Black Marble

#### 2. Choose Size & Enter Quantities

~~\$12.18~~  
**\$7.40**

<b>XS</b> 55-57 in stock	<b>S</b> 58-60 in stock	<b>M</b> 61-63 in stock	<b>L</b> 64-66 in stock	<b>XL</b> 67-69 in stock
--------------------------------	-------------------------------	-------------------------------	-------------------------------	--------------------------------

~~\$18.18~~  
**\$9.56**

**2XL**  
70-72  
in stock

BELLA+CANVAS  
3650 UNISEX

Model: 3650  
Cotton: 52%  
Weight: 3.6 Oz  
Sizes: XS, S, M, L, XL, 2XL

#### Features:

- Tear-away label
- Unisex sizing
- Sideseamed
- Retail fit
- Speckled - 3.8 oz., 50% poly, 25%combed ringspun cotton, 25% rayon, 30 singles
- Slub - 3.8 oz., 50% poly, 37.5%combed ringspun cotton, 12.5% rayon, 30 singles
- Black Mineral Wash is 4.2 oz., 100% Airlume combed and ring-spun cotton, 32 singles
- Acid wash colors - 4.2 oz., 52% combed ringspun cotton, 48% poly, 30 singles
- Marble colors are 4 oz., 91% polyester, 9%combed ringspun cotton, 30 singles
- 40 singles
- 3.6 oz., 52% combed and ringspun cotton, 48% polyester

**ADD TO CART**

Prices already bulk discounted  
Free Return Shipping  
Try it on. Not for you? Easy Returns.  
Free return shipping labels for the next 45 days.

See Similar Products

4.8 ★★★★★  
Google  
Customer Reviews

# EXHIBIT “F”

jiffyshirts - Google Search

google.com/search?q=jiffyshirts&rlz=1C1CHBF\_enUS832US832&oq=jiffyshirts&aqs=chrome..69j57j0j69i60j4.2111j0j4&sourceid=chrome&ie=UT...

Google

jiffyshirts

All Shopping Images News Maps More Settings Tools

About 174,000 results (0.42 seconds)

**JiffyShirts.com | T-Shirts For Cheap At \$1.75**

(Ad) [www.jiffyshirts.com/Apparel/Online](http://www.jiffyshirts.com/Apparel/Online)

We Offer Fashionable, Comfortable and High-Quality T-Shirts For Both Men and Women. Fast Delivery, Bulk Discounts, Always In Stock & Cheapest Prices. Buy Today. Ships today. Free shipping & Returns. Bulk discounts. Types: T-Shirts, Sweatshirts, Pants & Shorts, Polo Shirts.

<b>Women's Shirts</b> 137 Different Styles of Women's Shirts Available at Low Prices.	<b>Men's Polos</b> Shop Popular Brands in a Variety of Sizes and Colors
--	--

**Wholesale Jiffyshirts | ShirtChamp.com**

(Ad) [www.shirtchamp.com/](http://www.shirtchamp.com/)

Bulk Jiffyshirts. Fast Delivery & Free Shipping - Always In Stock  
Gildan T-shirts Wholesale · Sweatshirts Wholesale · Wholesale Golf Shirts

**\$1.68 - Blank Tees | Fast Free Delivery | CheapestTees.com**

(Ad) [www.cheapesttees.com/](http://www.cheapesttees.com/)

Free Returns - Lowest Prices Online. Family Owned And Operated. Multiple Payment Options.  
Short Sleeve T-Shirts · Long Sleeve T-Shirts · Women's T-Shirts · Youth & Baby T-Shirts

**Wholesale Blank Shirts - JiffyShirts.com**

<https://www.jiffyshirts.com>

JiffyShirts.com has the lowest prices fastest delivery Shop for cheap Blank Shirts, T-shirts, polo shirts, jackets, Tee Shirts, knit shirts, fleece pullovers, denim ...

<b>Bella+Canvas</b> Ladies' Jersey Short-Sleeve Deep V-Neck T-Shirt. Bella+Canvas ...	<b>Gildan</b> Top Seller; Sale. Adult Unisex Heavy Cotton™ 5.3 oz. T-Shirt ...
<b>Blank T-Shirts</b> Long Sleeve - Hanes 5250T Candy Orange - Tank Tops - ...	<b>Kid's Shirts</b> Shop for cheap Blank Shirts, T-shirts, polo shirts, jackets, Tee ...

# EXHIBIT “G”

## Order Summary

### Shipping Address

WILLIAMSBURG, VA  
23185  
United States

### Billing Address

WILLIAMSBURG, VA  
23185  
United States

### Order Total

Product Total:	\$1.62
Shipping:	\$5.95
Applicable Sales Tax:	\$0.12
Processing Tax Fee:	\$0.83
<b>Total:</b>	<b>\$8.52</b>

### Contact Information

### Payment Information

## Your cart: 1 item

Delivery: Arriving Tue, Sep. 24, 2019



Adult Unisex Heavy Cotton™ 5.3 oz. T-Shirt

White  
L

**GILDAN**  
G500

**\$1.62**

**1**

**\$1.62**

# EXHIBIT “H”



Printing Experts  
Since 2002



**(800) 620-1233**  
Talk to an Expert Now



**Live Chat**  
Chat with us now

### Your Order Summary



[Add Notes or Special Instructions](#)

[Continue to Next Step](#)

Test [Edit Design](#) [Remove this Design](#) [Add Garment](#)

G500 by Gildan Adult 5.3 oz. T-Shirt



Color : White  
L-1

[Edit Sizes](#)

1 items

~~(5.94)~~ 4.16  
4.16 each



[+ Add Another Design](#)

### Choose your Delivery Date



**Free Standard Delivery**  
**Save 30% off your entire order**

Guaranteed on October 4



**Rush Your Delivery**  
Guaranteed as early as September 20



**Super Saver Delivery**  
**Save 32.10% off your entire order**  
Guaranteed on October 7

Subtotal 30.15

Standard Delivery - 30.00% Off -25.99

Shipping & Handling FREE

Sales Tax 0.29

Voucher

**Grand Total**  
(1 items) **4.45**

[Continue to Next Step](#)

Or Checkout With

Pay with **PayPal**

Pay with **amazon**

Shipping

[Chat with an Expert](#)



# EXHIBIT “I”



# CheapestTees.com®

The Lowest-Priced, Name Brand T-Shirts On Earth!

Customer Service

Shipping Info

Special Offers

Call Toll Free:  
**(800) 758-1299**

Track Your Order



Live  
Help  
Chat Now

## Products

- Short Sleeve T-Shirts
- Polo Shirts
- Sweatshirts / Fleece / Outerwear
- Sweatpants/Shorts
- Long Sleeve T-Shirts
- Women's / Junior Tees & Sweats
- Youth, Infant, Toddler T-Shirts
- Pocket T-Shirts
- Tank Tops
- Organic & Eco-Friendly
- Dress Shirts / Wovens
- Socks
- Hats
- Bags & Totes
- Embroidery
- Screen Printing
- Family Reunion T-Shirts
- Bulk Discounts
- School Purchase Orders
- Embroidery Specials

Shop by Brand

## Customer Support

- Contact Us
- Shipping & Delivery
- Return Policy
- Pay By Check
- Can't Find It?
- Tell A Friend
- About Us

>> See What Customers Say...



T-Shirts, Polos, Sweatshirts...

SEARCH

Shipping

Confirmation



Get Shipping and Billing information from PayPal



Pay with your bank account, credit card or balance without sharing your financial information.

Get PayPal Info

### Shipping Information

#### Shipping Address

Email Address:

First Name:

Last Name:

Street Address:

Suite or Apt #:

City:  
 State:

Zip Code:  
 Phone:

☒ Please Send Discounts For CheapestTees.com

☐ Would you like Yahoo Small Business to send you an email asking you to rate this merchant?

#### Shipping Options

- ☒ \$3.95 USPS First Class (3-6 days)  
Get By Mon, Sep 23
- ☐ \$5.95 SurePost Economy (2-5 days)  
Get By Mon, Sep 23
- ☐ \$7.95 FedEx Ground  
Get By Fri, Sep 20

### Billing Information

#### Billing Address (Where Your Credit Card Statement is Sent)

☒ Same as Shipping

☐ Other

#### Payment Method

Pay using Credit Card

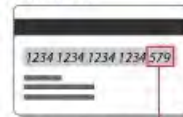


Card or account number:

Expiration month:  Expiration year:

Card Verification Number:

[What's This?](#)



card verification number

OR

Pay using PayPal



Pay with your bank account, credit card or balance without sharing your financial information. [Go to PayPal](#)

### Your Order

Item	Cost
1 Gildan Lightweight 100% Cotton T-Shirt Color : White Size : L	\$1.84
Subtotal:	\$1.84
Shipping:	\$3.95
Tax:	\$0.13
Total:	\$5.92

Case ID: 190509004

# EXHIBIT “J”



**SAME DAY SHIPPING**  
ORDER BY 4PM EST.

**BULK DISCOUNTS**  
AVAILABLE  
CLICK FOR DETAILS

**FREE RETURNS**

**FREE SHIPPING**  
\*ON ORDERS OVER \$69

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McAfee SECURE

T-Shirts

Sweatshirts

Polos

Womens

Kids

Bottoms

Dress Shirts

Hats

Jackets

Accessories

Shop Brands

NEW ARRIVALS  
FOR 2019

1 in Cart

Home > Adult 100% Cotton T-Shirts > Heavy Cotton 5.3 oz. T-Shirt

  
ORDER BY  
4PM EST. FOR  
SAME DAY  
SHIPPING



CLICK TO ZOOM



Color Picker



## Gildan Heavy Cotton 5.3 oz. T-Shirt

**GILDAN®**

**Style:** G500

**Fabric:** 100% Preshrunk Cotton

**Weight:** 5.3 oz.

**Sizes:** S, M, L, XL, 2XL, 3XL, 4XL, 5XL

### Features:

- 100% preshrunk cotton
- Seamless rib at neck
- Taped shoulder-to-shoulder
- Double-needle stitching throughout
- Tear-away label
- Antique (Cherry Red, Jade Dome, Irish Green, Sapphire, Orange) and Sport Grey are 90% cotton, 10% polyester
- Sunset, Safety Pink, Russet, Neon (Green, Blue), Midnight, Lilac, Blackberry, Tweed, Safety Green, S. Orange, Dark Heather, Graphite Heather, and Heather (Military Green, Radiant Orchid, Red, Sapphire) are 50% cotton, 50% polyester
- Ash Grey is 99% cotton, 1% polyester

[Click here to view size chart](#)

### Latest Review



Great. Love my purchase. Will definitely purchase again.  
MELISSA ..

[View All 910 Review\(s\)](#)

FOR SIZES S-XL

White: **\$1.59**

Neutrals: **\$2.59**

Colors: **\$2.75**



**When will I get it?**

Enter Delivery Zipcode...

**Go!**

4.6 ★★★★★

Google  
Customer Reviews

# EXHIBIT “K”

## Free Shipping at \$49 - Free Return Shipping All Orders - 45 Days Returns

### Automatic Bulk And Shipping Discounts

#### Discounted Shipping Rates

Cart Total	Shipping Rate
Cart Total \$49 & Over	<b>FREE SHIPPING!</b> (sale ends Mon, Sep. 30, 2019 - regular \$150 and over)
Under \$49	Ships for only \$5.95

#### No Hassle Bulk Discounts

Orders \$80 and up are automatically discounted.

The discount percentage increases with higher cart totals. Spend more, save more!

Cart Total	Discount
\$80 - \$149.99	4%
\$150 - \$249.99	10%
\$250 - \$499.99	<del>12%</del> 19%
\$500 - \$999.99	<del>14%</del> 21%
\$1000 - \$1749.99	<del>16%</del> 22%
\$1750 - \$3799.99	<del>16%</del> 23%
\$3800 & Up	<del>17%</del> 24%

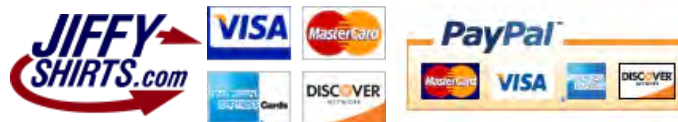
#### Sale Discounts

Sale items are already reduced from the regular selling price. All orders receive this discount regardless of size.

Sale items may receive additional bulk discounts but usually to a lower maximum rate. The bulk discounts are applied until the maximum percentage is reached.

For example, if a product has a max Bulk Discount of 5%, then 5% is the largest bulk discount to be applied regardless of a cart's total.

**The more you add to your cart, the more you save!**  
**No need to ask. No hassle! Your total is automatically discounted in the shopping cart.**



### Easy Returns

See how we make it easy:

- Buy now and return anytime in the next 45 days.
- Only JiffyShirts.com will provide a free return shipping label for your unwanted items!
- JiffyShirts.com does not charge a restock fee for your return.

Find full details and exceptions on returns here. Enter your return request quickly here.

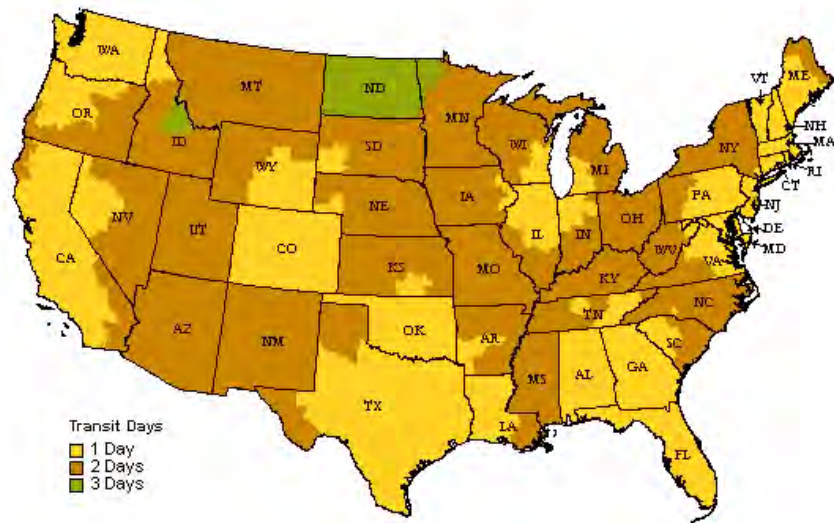
### 98% of orders can be delivered in 1 or 2 days at NO EXTRA CHARGE!

Our Fastest Shipping Times With UPS Ground

4.8 ★★★★★  
Google

Customer Reviews  
Case ID: 190509004





## Shipping - Trust JiffyShirts.com to Deliver!

*thank you again for the prompt --speedy speedy service. I am amazed!! Thanks -Jackie*

*We look forward to continuously ordering from you all -Monica*

*Thank you for your quick service - Drago*

*I was extremely impressed with your response time - Joey, LA*

*Thank you for your notification of shipment of this order - Sandy*

*Thanks for delivering the shirts so quickly - Marcus*

*I received my order today I could not believe how quickly I received it. Thank you for your promptness - Suzanne*

## Here are Some Answers to Frequently Asked Questions about Shipping.

### Is it really this fast? Are these dates real?

These dates are real! Our customers can't believe how fast we delivered.

Our dates come directly from UPS based on your shipping address and our 3 closest warehouses. That means at least 3 warehouses could deliver your order by this date. Only at JiffyShirts.com!

We would not order without a delivery date...why should you?

### Am I charged extra for "split" or "partial" shipping?

Never. The S & H charge is final. Almost all orders ship from one warehouse. If we need to ship from more than one warehouse, JiffyShirts.com pays...not you!

### Why is shipping so cheap?

The answer is simple. We hate paying shipping as much as you do.

So we offer the lowest total price by charging the lowest price for products and the lowest price for shipping. This is cheaper for our customers than hiding shipping costs in our product prices.

**Please Note:** "UPS Ground" delivery times are not guaranteed. The dates are accurate 99% of the time.

## Why JiffyShirts.com Is Different

We want to deliver your shirts quick and cheap. We understand that you may be buying for your company, Church, community group, or a personal event. We know you have important deadlines.

More people making large group purchases use JiffyShirts.com to deliver.

This is why we have invested in shipping quickly through our national warehouse network and directly linking to UPS for delivery dates. Our customers can count on getting what they ordered when they need it. This also means you get your orders the fastest and cheapest with JiffyShirts.com.

To get shipping times and cost, simply add items to your cart. Then enter your shipping City, State, and Zip Code. You will see an estimated delivery date.

4.8 ★★★★★  
Google  
Customer Reviews  
Case ID: 190509004

We will send you a UPS Tracking Number the same day your order ships.

Alaska and Hawaii shipping not offered.

At this time, we only ship within the USA. No international orders.

---

## Payment

We accept Visa, MasterCard, JCB, Discover and American Express credit cards.

We also accept PayPal.

We do not accept P.O. numbers, wires, or checks.

---

# EXHIBIT “L”



JUN JUL AUG

◀ 04 ▶

2016 2017 2018



▼ About this capture

[228 captures](#)

1 Apr 2007 - 13 Nov 2017



- [Bulk Discount at \\$80](#)
- [Free Shipping at \\$59 \\$49](#)
- [Order by 6pm Ships Today](#)
- [Free Returns](#)
- [Delivery Date in cart](#)



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- [Polos](#)
- [Pants](#)
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  - [Work Shirts](#)
  - [Towels](#)
  - [Aprons](#)
  - [Blankets](#)

[view cart](#)

- [My Orders](#)
- [Contact Us](#)

**Sorry, we do not ship to AK, DE, HI, AA, AE, AP or any other location outside of the mainland.**

<https://www.jiffyshirts.com/shipping>

Go

JUN JUL AUG

04

2016 2017 2018



▼ About this capture

228 captures

1 Apr 2007 - 13 Nov 2017

## Automatic Bulk And Shipping Discounts

### Discounted Shipping Rates

#### Cart Total

#### Shipping Rate

Cart Total \$49 & Over **FREE SHIPPING!**  
(sale ends July 31st, 2017 - regular \$150 and over)

Under \$49 Ships for only 5.95

### No Hassle Bulk Discounts

Orders \$80 and up are automatically discounted.

The discount percentage increases with higher cart totals. Spend more, save more!

## Anniversary Sale

Cart Total	Discount
\$80 - \$149.99	4%
\$150 - \$249.99	10%
\$250 - \$499.99	<del>12%</del> 19%
\$500 - \$999.99	<del>14%</del> 21%
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\$3800 & Up	<del>17%</del> 24%

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**No need to ask. No hassle! Your total is automatically discounted in the shopping cart.**



<https://www.jiffyshirts.com/shipping>

Go

JUN JUL AUG

◀ 04 ▶

2016 2017 2018



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[228 captures](#)

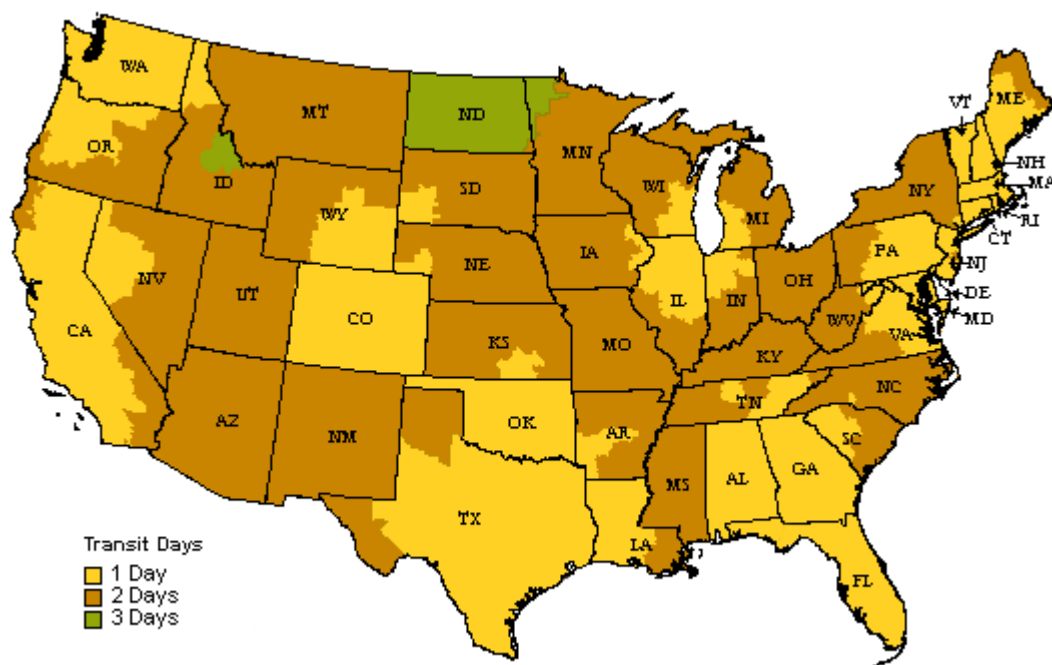
1 Apr 2007 - 13 Nov 2017

- Buy now and return or exchange anytime in the next 45 days.
- Only JiffyShirts.com will provide a free return shipping label for your unwanted items!
- JiffyShirts.com does not charge a restock fee for your exchange or return.

Find full details and exceptions on [exchanges and returns here](#). Enter your [exchange or return request quickly here](#).

## 98% of orders can be delivered in 1 or 2 days at NO EXTRA CHARGE!

### Our Fastest Shipping Times With UPS Ground



## Shipping - Trust JiffyShirts.com to Deliver!

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*Thanks for delivering the shirts so quickly - Marcus*

Case ID: 190509004

<https://www.jiffyshirts.com/shipping>

Go

JUN JUL AUG

◀ 04 ▶

2016 2017 2018



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1 Apr 2007 - 13 Nov 2017

## Here are Some Answers to Frequently Asked Questions about Shipping.

### Is it really this fast? Are these dates real?

These dates are real! Our customers can't believe how fast we delivered.

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We would not order without a delivery date...why should you?

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Never. The S & H charge is final. Almost all orders ship from one warehouse. If we need to ship from more than one warehouse, JiffyShirts.com pays...not you!

### Why is shipping so cheap?

The answer is simple. We hate paying shipping as much as you do.

So we offer the lowest total price by charging the lowest price for products and the lowest price for shipping. This is cheaper for our customers than hiding shipping costs in our product prices.

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---

## Why JiffyShirts.com Is Different

We want to deliver your shirts quick and cheap. We understand that you may be buying for your company, Church, community group, or a personal event. We know you have important deadlines.

More people making large group purchases use JiffyShirts.com to deliver.

This is why we have invested in shipping quickly through our national warehouse network and directly linking to UPS for delivery dates. Our customers can count on getting what they ordered when they need it. This also means you get your orders the fastest and cheapest with JiffyShirts.com.

To get shipping times and cost, simply add items to your cart. Then enter your shipping City, State, and Zip Code. You will see shipping rates and an estimated delivery date.

We will send you a UPS Tracking Number the same day your order ships.

Alaska, Delaware and Hawaii shipping not offered.

At this time, we only ship within the USA. No international orders.

---

## Payment

We accept Visa, MasterCard, Discover and AmericanExpress credit cards.

We also accept PayPal.

Case ID: 190509004

https://www.jiffyshirts.com/shipping  JUN JUL AUG  
◀ 04 ▶  
2016 2017 2018

228 captures  
1 Apr 2007 - 13 Nov 2017

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## Free Shipping at \$49 - Free Return Shipping All Orders - 45 Days Returns

### Automatic Bulk And Shipping Discounts

#### Discounted Shipping Rates

Cart Total	Shipping Rate
Cart Total \$49 & Over	<b>FREE SHIPPING!</b> (sale ends June 30th, 2017 - regular \$150 and over)
Under \$49	Ships for only 5.95

#### No Hassle Bulk Discounts

Orders \$80 and up are automatically discounted.

The discount percentage increases with higher cart totals. Spend more, save more!

#### Anniversary Sale

Cart Total	Discount
\$80 - \$149.99	4%
\$150 - \$249.99	10%
\$250 - \$499.99	<del>42%</del> 19%
\$500 - \$999.99	<del>44%</del> 21%
\$1000 - \$1749.99	<del>46%</del> 22%
\$1750 - \$3799.99	<del>46%</del> 23%
\$3800 & Up	<del>47%</del> 24%

#### Sale Discounts

Sale items are already reduced from the regular selling price. All orders receive this discount regardless of size.

Sale items may receive additional bulk discounts but usually to a lower maximum rate. The bulk discounts are applied until the maximum percentage is reached.

For example, if a product has a max Bulk Discount of 5%, then 5% is the largest bulk discount to be applied regardless of a cart's total.

**The more you add to your cart, the more you save!**  
No need to ask. No hassle! Your total is automatically discounted in the shopping cart.



### Easy Exchanges & Returns

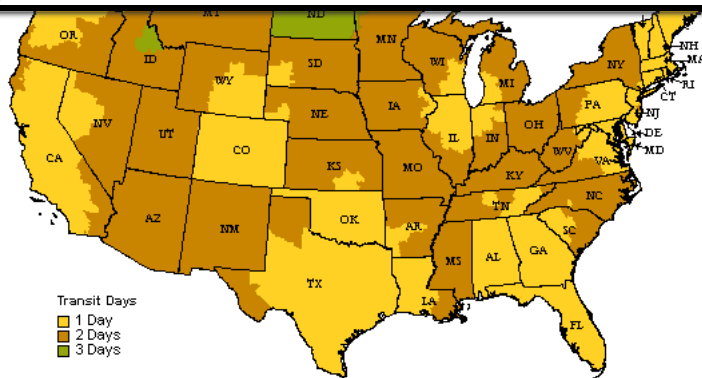
See how we make it easy:

- Buy now and return or exchange anytime in the next 45 days.
- Only JiffyShirts.com will provide a free return shipping label for your unwanted items!
- JiffyShirts.com does not charge a restock fee for your exchange or return.

Find full details and exceptions on exchanges and returns here. (/web/20170608234247/http://www.jiffyshirts.com/help) Enter your exchange or return request quickly here. (/web/20170608234247/http://www.jiffyshirts.com/contactus)

### 98% of orders can be delivered in 1 or 2 days at NO EXTRA CHARGE!

Our Fastest Shipping Times With UPS Ground



## Shipping - Trust JiffyShirts.com to Deliver!

*thank you again for the prompt --speedy speedy service. I am amazed!! Thanks -Jackie*

*We look forward to continuously ordering from you all -Monica*

*Thank you for your quick service - Drago*

*I was extremely impressed with your response time - Joey, LA*

*Thank you for your notification of shipment of this order - Sandy*

*Thanks for delivering the shirts so quickly - Marcus*

*I received my order today I could not believe how quickly I received it. Thank you for your promptness - Suzanne*

## Here are Some Answers to Frequently Asked Questions about Shipping.

### Is it really this fast? Are these dates real?

These dates are real! Our customers can't believe how fast we delivered.

Our dates come directly from UPS based on your shipping address and our 3 closest warehouses. That means at least 3 warehouses could deliver your order by this date. Only at JiffyShirts.com!

We would not order without a delivery date...why should you?

### Am I charged extra for "split" or "partial" shipping?

Never. The S & H charge is final. Almost all orders ship from one warehouse. If we need to ship from more than one warehouse, JiffyShirts.com pays...not you!

### Why is shipping so cheap?

The answer is simple. We hate paying shipping as much as you do.

So we offer the lowest total price by charging the lowest price for products and the lowest price for shipping. This is cheaper for our customers than hiding shipping costs in our product prices.

**Please Note:** "UPS Ground" delivery times are not guaranteed. The dates are accurate 99% of the time.

## Why JiffyShirts.com Is Different

We want to deliver your shirts quick and cheap. We understand that you may be buying for your company, Church, community group, or a personal event. We know you have important deadlines.

More people making large group purchases use JiffyShirts.com to deliver.

This is why we have invested in shipping quickly through our national warehouse network and directly linking to UPS for delivery dates. Our customers can count on getting what they ordered when they need it. This also means you get your orders the fastest and cheapest with JiffyShirts.com.

To get shipping times and cost, simply add items to your cart. Then enter your shipping City, State, and Zip Code. You will see shipping rates and an estimated delivery date.

We will send you a UPS Tracking Number the same day your order ships.

Alaska, Delaware and Hawaii shipping not offered.

At this time, we only ship within the USA. No international orders.


## Payment

We accept Visa, MasterCard, Discover and AmericanExpress credit cards.


We also accept PayPal.

We do not accept P.O. numbers, wires, or checks.

Case ID: 190509004



Search for products



(web/20170608234247/http://www.jiffyshirts.com/)

Shop by Category:

T-SHIRTS

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SWEATSHIRTS

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PANTS & SHORTS

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POLO SHIRTS

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BAGS

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Shop by Fit:

ADULT

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/ADULT)

CUT=ADULT)

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/?CUT=ADULT)

CUT=WOMEN)

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/?CUT=WOMEN)

MEN

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/MEN)

CUT=MEN)

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/?CUT=MEN)

YOUTH

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/YOUTH)

CUT=YOUTH)

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/?CUT=YOUTH)

TODDLER

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/TODDLER)

CUT=TODDLER)

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/?CUT=TODDLER)

INFANT

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/INFANT)

CUT=INFANT)

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Customer Service:

CONTACT US

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RETURNS

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# EXHIBIT “M”

**Delivery: Fri, Sep. 20, 2019**  
**All items in stock. Ships Today!**

Sorted By: Item ▼

**Your cart: 1,000 items**

Adult Unisex Heavy Cotton™ 5.3 oz. T-Shirt



White  
L

**\$1.62**

**1000**

remove

**\$1,620.00**

**GILDAN**  
G500

Fri, Sep. 20, 2019 All items

On Thursday, shipping 1000 items weighing 420 LBS  
to WILLIAMSBURG, 23185.  
(change destination)

**Pick Shipping Speed** \$49 & Over Ships FREE

☒ **FREE Express Shipping**

**Fri, Sep. 20, 2019**

**All items in stock. Ships Today!**  
**Delivery: Fri, Sep. 20, 2019**

If ordered in the next  
**33 minutes**

1000 items

\$1,620.00

**FREE! Shipping:**

**\$0.00**

**Subtotal:**

**\$1,620.00**

Retail Total: \$4,300.00  
 Retail Savings: \$2,680.00

No hidden shipping fees. Discounts rounded to the nearest cent.

**CHECK OUT**

**PayPal Check out**

The safer, easier way to pay

4.8 ★★★★★  
 Google  
 Customer Reviews

Case ID: 190509004

Ref Code




# EXHIBIT “N”

First Delivery: Fri, Sep. 20, 2019  
All items in stock. Ships Today!

Sorted By: Item

Your cart: 375 items

Adult Unisex Heavy Cotton™ 5.3 oz. T-Shirt




Corn Silk  
M

~~\$2.67~~  
**\$2.16**

375

remove

~~\$1,001.25~~  
**\$810.00**  
Save: \$191.25



Fri, Sep. 20, 2019 122 items

Fri, Sep. 20, 2019 11 items

Mon, Sep. 23, 2019 242 items

On Wednesday, shipping 375 items weighing 157.5 LBS  
to WILLIAMSBURG, 23185.  
(change destination)

Pick Shipping Speed \$49 & Over Ships FREE

☒ FREE Express Shipping

Fri, Sep. 20, 2019122 items

Fri, Sep. 20, 201911 items

Mon, Sep. 23, 2019242 items


All items in stock. Ships Today!

First Delivery: Fri, Sep. 20, 2019

If ordered in the next  
36 minutes

375 items

**Bulk Discount:**

FREE!  **Shipping:**

\$1,001.25

**- \$191.25**

**\$0.00**

**Subtotal:**

**\$810.00**

Retail Total: \$2,100.00  
Retail Savings: \$1,098.75

No hidden shipping fees. Discounts rounded to the nearest cent.

CHECK OUT



The safer, easier way to pay

Ref Code



# EXHIBIT “O”

Quoting For

ORDER QUANTITY ⓘ  
20

# OF PRINT COLORS ⓘ  
1

DELIVERY TO  
19102 ✈

FABRIC COLOR  
▼

Update

61 printers found

Get it by

Enter Date

- Methods
- Screen Printing (59)

Embroidery (46)

Heat Transfer (31)

Direct to Garment (15)

Discharge Printing (14)

- More Methods
- 3D Embroidery (13)

Digital Printing (11)

Sublimation (9)

Bedazzle (2)

Laser Etching (2)

- Uses
- Fundraisers (59)

Corporate (47)

School (46)

Celebrations (44)

Colleges (41)


- More Uses
- Teams and Jerseys (36)

Conference Swag (13)


School Pride (13)

Uniforms (13)


Recommended ▼




1 OF 2




1 OF 7



1 OF 16



OF 15




Kinteco Screen Prin...  
35 years in business  
★★★★★ 5.0 (1)

\$14.59 per print

26 days delivery 09/04/2019

Choose Printer




Teeth Like Swords ...  
7 years in business  
★★★★★ 5.0 (15)

\$8.00 per print

52 days delivery 09/30/2019

Choose Printer




Paper Root Printing ...  
18 years in business  
★★★★★ 4.9 (12)

\$6.00 per print

14 days delivery 08/23/2019

Choose Printer




STEPscreen Printing  
2 years in business  
★★★★★ 5.0 (7)

\$12.00 per print

17 days delivery 08/26/2019

Added




Showbiz Screen Pri...  
25 years in business  
★★★★★ 5.0 (2)

\$13.23 per print

19 days delivery 08/28/2019

Choose Printer




School Tee Factory  
37 years in business  
★★★★★ 5.0 (2)

\$12.00 per print

13 days delivery 08/22/2019

Choose Printer




Kirkwood Trading C...  
26 years in business  
★★★★★ 5.0 (16)

\$11.00 per print

17 days delivery 08/20/2019

Choose Printer



Shirt Printing 4U, Inc  
17 years in business  
★★★★★ 5.0 (12)

\$14.59 per print

14 days delivery 08/23/2019

Choose Printer



# EXHIBIT “P”



\$40.00 / hour    \*billed in 15 minute increments



[View Review Details >](#)

Awesome guys awesome company

★★★★★ From Joe on Tue, June 25, 2019

USAGE  
Other

METHOD  
Screen Printing

I started a lifestyle brand and these guys were very friendly and great at saving me money and time and headaches. They helped me with picking the right shirt for what I was trying to do and really helped with my design and put everything in place for me so I could succeed. I just met these guys a month ago and I've done 3 jobs with them and each time I'm super happy with the print be it a distressed print or a vintage look or just a typical print. I'm all over the place and it's gotten to the point where I know I can give them little instruction and they take it and run with it. It's perfect for me because I don't know a whole lot of the design part of the marketing business and these guys have been great to work with. I'm recommend them to anyone looking to order custom tees.

Was this review helpful?

Yes

No

[View Review Details >](#)

Never disappointed

★★★★★ From Spencer on Tue, June 25, 2019

USAGE  
Colleges

METHOD  
Screen Printing

Unhappy with the local printer in our college town we stumbled upon Kirkwood Trading Company several years back. We have so many kids in our fraternity from St. Louis it's easy to use them for our shirts because someone is always in town to pick up the shirts. I think I'm the fourth chapter President to use these guys so we are obviously always happy. And I know when I graduate I'll be leaving their contact information for the next President because they are easy to work with and our shirts always come out great.

Was this review helpful?

Yes

No

[View Review Details >](#)

We love our long time vendor

★★★★★ From Kelli on Wed, June 26, 2019

USAGE  
School

METHOD  
Screen Printing

Kirkwood Trading Company has been our high school spirit store vendor for over 10 years. I currently have the pleasure of working with them for the past 3 years. They are very easy to work with. I routinely send over several different orders at one time and they are quick to get them complete and I know they will be done right. The are great at bringing us new product ideas and helping us stay on top of the trends. Whether it's sweatshirts, t-shirts, hats, bags, or sweatpants, I'd recommend them to anyone.

Was this review helpful?

Yes

No



[View Review Details >](#)

### Team jerseys were a big hit

★★★★★ From Jessica on Tue, June 25, 2019

USAGE	METHOD
Team	Heat Transfer, Screen Printing

First time customer and no experience ordering, designing, or doing anything but wearing t-shirts. I contacted Kirkwood Trading Company for my daughters soccer team and all I had was that they wanted to be the Penguins. That's it. Matt came back with a graphic that was amazing and the girls loved it. We had them put custom names and numbers on it and my daughter and her friends where them everywhere. So we know we will be back next year when the new season starts and they grow out of these.

Was this review helpful?

Yes

No



[View Review Details >](#)

### Kirkwood Trading makes ordering apparel for our swim team easy!

★★★★★ From Angie on Tue, June 25, 2019

USAGE	METHOD
Team	Screen Printing

FAST is a 350+ swimmer swim team and Kirkwood Trading Company is our source for all of our team apparel needs. Whether we need team t-shirts, an online team store to sell to the parents, or a last minute order of championship meet shirts, Kirkwood Trading Company never fails to deliver a quality product that promotes FAST swimming. Matt and Mike are quick to respond to questions to any questions FAST has and have even gone over and above to help us out with last minute orders.

Was this review helpful?

Yes

No



[View Review Details >](#)

### Above and beyond

★★★★★ From Connie on Tue, June 25, 2019

USAGE	METHOD
Colleges	Screen Printing

Matt went above and beyond the call of duty. He returned my call even though they were closed on a Sunday and helped me out by getting our annual t-shirts printed in two days because I forgot

Was this review helpful?

Yes

No

to order them. We all loved the shirts and it is hard to find a company that gives this great of customer service. I am now a life long customer and would recommend Kirkwood Trading to anyone looking for shirts, great product, great price and great service. Thanks Matt and staff !!!

[View Review Details >](#)

Always fast, friendly, and on time.

★★★★★ From Jeremiah on Tue, June 25, 2019

USAGE	METHOD
Corporate	Screen Printing

I've been calling on Kirkwood Trading Company for several years now. I'm always late in calling in my shirt order because I'm busy and we go through shirts like crazy in the tree business. So one week I'm good on shirts and the next half my guys have rips and tears and sap on their shirts. So I call these guys, I tell them what I need and they get it done in a few days. No issues and I don't have to spend a lot of time as they know what I want and how I like it.



[View Review Details >](#)

Was this review helpful?

<input type="button" value="Yes"/>	<input type="button" value="No"/>
------------------------------------	-----------------------------------

Very Happy Customer

★★★★★ From Jennifer on Tue, June 25, 2019

USAGE	METHOD
Events	Screen Printing

I've been using Kirkwood Trading Company for several years and it's always been a great experience. I give them some bad artwork and they always come back with something that blows me away. No matter if one year I drop the ball and come in last minute, they are always easy to help and get things done. The shirts each time are always fantastic. Will continue using as long as I need shirts.



[View Review Details >](#)

Was this review helpful?

<input type="button" value="Yes"/>	<input type="button" value="No"/>
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Great shirts and easy to work with

★★★★★ From Stacey on Tue, June 25, 2019

USAGE	METHOD
Fundraisers	Screen Printing

We've been using Kirkwood Trading Company for over 5 years now. They are always easy to work with and turn our orders around very quickly. When we have questions about new products they are quick to answer and informative. When we

Was this review helpful?

<input type="button" value="Yes"/>	<input type="button" value="No"/>
------------------------------------	-----------------------------------

place orders they are fast the our shirts come out great every time. I'd highly recommend to anyone looking for custom t-shirts.

[View Review Details >](#)

### They make my life easy

★★★★★ From Nancy on Tue, June 25, 2019

USAGE	METHOD
Celebrations	Screen Printing

I've used Kirkwood Trading Company many years for my family vacation t-shirts. I always give them my own mock up and they are able to transform it into artwork and a great t-shirt. Every year we do a different design and they have always been great about helping with a design or making our design work. The shirts are always a hit! So we keep coming back.



[View Review Details >](#)

Was this review helpful?

Yes	No
-----	----

### They make use look good

★★★★★ From Rich on Tue, June 25, 2019

USAGE	METHOD
Corporate	Screen Printing

I found these guys by accident and it's been a great relationship for the past few years. They print all my corporate t-shirts and polos. They also started doing our online corporate store which saves me a ton of time and money and for that I'm grateful. Always quick to respond and never had any issues with any work they've done. A Very happy customer.

[View Review Details >](#)

Was this review helpful?

Yes	No
-----	----

### good guys and great shirts

★★★★★ From John on Tue, June 25, 2019

USAGE	METHOD
Corporate	Screen Printing

Great company to work with. This was my first time dealing with Matt and the service was great. I needed a large custom order with several different kinds of apparel in a tight time frame and they came through with flying colors! Will definitely deal with Kirkwood Trading Co. again. John B. VP Sales and Marketing

[View Review Details >](#)

Was this review helpful?

Yes	No
-----	----

### Very easy to work with

★★★★★ From Julie on Tue, June 25, 2019

USAGE	METHOD
School	Screen Printing



We love working with Kirkwood Trading! They designed our 3rd grade Jeff City t-shirts for 98 kids! The kids loved the shirts, we came in under budget and amazing turn around time for finished product. We highly recommend Kirkwood Trading for all your custom screen printing needs!!

Was this review helpful?

Yes

No

[View Review Details >](#)

Fast and easy

★★★★★ From Barbara on Tue, June 25, 2019

USAGE  
Events

METHOD  
Screen Printing

The service was fast and helpful. Both Matt and Mike made the entire process of ordering so smooth and easy. The quality of shirts was excellent and I would definitely recommend this company to anyone looking for quality custom printing.

Was this review helpful?

Yes

No

[View Review Details >](#)

Great company to work with

★★★★★ From Ashley on Tue, June 25, 2019

USAGE  
Corporate

METHOD  
Screen Printing

We have used KTC for a few years for our work shirts, super great customer service, fast turn around and competitive pricing! Always my go to screen printer, thanks for the great work Kirkwood Trading Company!

Was this review helpful?

Yes

No

[View Review Details >](#)

Pricing

Custom Artwork Fees: \$40.00 per hour, billed in 15 minute increments

Screen Printing

printing on a WHITE shirt

Minimum Order Quantity: 12

Minimum	Maximum	1 color	2 color	3 color	4 color	5 color	6 color
12	23	\$11.00	\$12.00	\$13.00	\$14.00	\$17.00	\$18.00
24	47	\$9.00	\$11.00	\$12.00	\$13.00	\$15.00	\$16.00
48	71	\$6.00	\$7.50	\$8.00	\$8.50	\$9.50	\$10.00
72	143	\$5.85	\$6.50	\$7.45	\$8.00	\$9.10	\$9.50
144	287	\$5.50	\$6.25	\$7.25	\$7.65	\$8.25	\$9.00
288	400	\$5.25	\$6.00	\$7.00	\$7.35	\$8.00	\$8.75

printing on a DARK shirt

Minimum Order Quantity: 12

Minimum	Maximum	1 color	2 color	3 color	4 color	5 color	6 color
---------	---------	---------	---------	---------	---------	---------	---------

Minimum	Maximum	1 color	2 color	3 color	4 color	5 color	6 color
12	23	\$12.00	\$13.00	\$14.00	\$15.00	\$19.00	\$22.00
24	47	\$10.00	\$12.00	\$14.00	\$16.00	\$18.00	\$20.00
48	71	\$7.00	\$9.00	\$11.00	\$13.00	\$15.00	\$17.00
72	143	\$6.00	\$8.00	\$9.00	\$11.00	\$13.00	\$15.00
144	287	\$5.85	\$7.25	\$8.00	\$9.50	\$11.75	\$13.85
288	400	\$5.50	\$7.15	\$7.74	\$9.00	\$10.00	\$11.00

## About the printer



**Kirkwood Trading Company**  
Custom T-shirts In A Few Days

No Info Provided



# EXHIBIT “Q”



CUSTOM ARTWORK FEES

\$50.00 / hour    \*billed in 15 minute increments

It was our first time making shirts for our small diner. We had an image and an idea and Paul really helped make it a reality. They were honest about what makes the best image and thoughtful about my vision. They were professional and pretty quick too. The final product was exactly what I wanted, and we went straight to them for our second design too!



[View Review Details >](#)

Was this review helpful?

Yes

No

Best damn shirt shop in town

★★★★★ From Eric on Fri, July 19, 2019

USAGE  
Other

METHOD  
Screen Printing

I’ve been buying shirts from the TLS crew for years. Always printed well, great original designs and a really helpful team. A few years ago, they had a project where designers came up with a drawing, they printed the shirts, and all profits went to local charities. I designed a shirt and had a great experience working with them through the whole process. And they ended up making a solid contribution to the local charity as well! These guys are the best around. Period.

[View Review Details >](#)

Was this review helpful?

Yes

No

The best of the best!

★★★★★ From Mike on Fri, July 19, 2019

USAGE  
Other

METHOD  
Screen Printing

Teeth Like Swords printed a bunch of merch for a few of my bands on numerous occasions. The turnaround has always been very fast and they are very detail oriented and very easy to work with. The end results surpassed our wildest expectations. I would highly recommend supporting Teeth Like Swords for all of your screen printing needs. I will definitely be going back to them.

[View Review Details >](#)

Was this review helpful?

Yes

No

Repeat reprinter

★★★★★ From Christine on Fri, July 19, 2019

USAGE  
Other

METHOD  
Screen Printing, Direct to Garment

I use TLS to print the products I sell on my etsy they have the fastest local turn around in Providence and sometimes offer local delivery! I have recommended them to several non profits I work with and everyone is very satisfied with the customer service and attention to detail their orders get.

Was this review helpful?

Yes

No



[View Review Details >](#)

### We love Teeth Like Swords!

★★★★★ From Brian on Fri, July 19, 2019

**USAGE**  
Other

**METHOD**  
Screen Printing

My band has worked with Teeth Like Swords twice to screenprint LP artwork and both times we've even been happier with how the it looks printed on the sleeve by Paul than the digital versions. They are receptive to small run projects and have very reasonable rates. Can't recommend highly enough.

Was this review helpful?

Yes

No

[View Review Details >](#)

### Best around RI

★★★★★ From Eric on Fri, July 19, 2019

**USAGE**  
Other

**METHOD**  
Screen Printing

Top notch, super fast turn around time. Had an impending deadline to get 100 shirts screenorinted and teeth like swords hopped right on it. Great quality and super easy to work with. Great experience all around and I'd definitely use them again. Cheers

Was this review helpful?

Yes

No

[View Review Details >](#)

### Great quality amazing service

★★★★★ From Michael on Fri, July 19, 2019

**USAGE**  
Events

**METHOD**  
Screen Printing

Incredibly accommodating and always responsive, the shirts I've had printed came out wonderfully, clean prints, lasting image, and they're so easy to work with. The prices are amazing as well! Would rate 6 stars if that was an option!

Was this review helpful?

Yes

No



[View Review Details >](#)

### Awsome company to work with

★★★★★ From James on Fri, July 19, 2019

**USAGE**  
Other

**METHOD**  
Screen Printing

Super honest and professional! Great people to work with... really happy with shirts... turnaround time... everything! Definitely

Was this review helpful?

Yes

No

Case ID: 190509004

my first choice for printing

[View Review Details >](#)

Excellent shirts for my band!

★★★★★ From Eric on Fri, July 19, 2019

USAGE

METHOD

Screen Printing

These dudes did an amazing job, high quality shirts in the exact colors and inks we wanted, and done fast. Super affordable prices would definitely recommend!

Was this review helpful?

Yes

No



[Hide Review Details >](#)

Final Product	Customization Quality	Printer Response	Pr
POOR	EXCELLENT	POOR	PO

Awesome screenprinted LP jackets

★★★★★ From Jesse on Fri, July 19, 2019

USAGE

METHOD

Screen Printing

Other

Teeth Like Swords did the screenprinting for both Snowplows LP jackets. Great results, and Paul was easy to work with the whole way through. Recommended!

Was this review helpful?

Yes

No

[Hide Review Details >](#)

Final Product	Customization Quality	Printer Response	Pr
POOR	EXCELLENT	POOR	PO

Highest possible recommendation

★★★★★ From Richard on Fri, July 19, 2019

USAGE

METHOD

Screen Printing

Other

I've gone through Teeth Like Swords for different projects multiple times over the years. Always professional, always on time. 100% recommended.

Was this review helpful?

Yes

No

[View Review Details >](#)

Top Notch

★★★★★ From Jared on Fri, July 19, 2019

USAGE: Other  
METHOD: Screen Printing

Fast and great service. Top notch quality printing and Paul is awesome to deal with! Highly recommended.

Was this review helpful?

Yes

No

[View Review Details >](#)

Gorgeous etchings on vinyls

★★★★★ From Jesper on Sat, July 20, 2019

USAGE:   
METHOD: Screen Printing, Digital Printing

The etchings on Lesseners vinyl, made my Teeth Like Swords, is one of the most beautiful things I’ve seen.

Was this review helpful?

Yes

No

[View Review Details >](#)

Quick turnaround, great prices

★★★★★ From Rob on Fri, July 19, 2019

USAGE: Events  
METHOD: Screen Printing

I've used Teeth Like Swords for several jobs and I have always been happy with the work they've delivered.

Was this review helpful?

Yes

No

[View Review Details >](#)

Pricing

Custom Artwork Fees: \$50.00 per hour, billed in 15 minute increments

Screen Printing

printing on a WHITE shirt

Minimum Order Quantity: 5

Minimum	Maximum	1 color	2 color	3 color	4 color
5	19	\$10.00	\$13.00	\$17.00	\$20.00
20	49	\$8.00	\$9.50	\$11.00	\$12.50
50	74	\$6.00	\$7.50	\$9.00	\$10.50
75	99	\$5.00	\$6.50	\$8.00	\$9.50
100	149	\$4.50	\$6.00	\$7.50	\$9.00
150	200	\$4.00	\$5.50	\$7.00	\$8.50

printing on a DARK shirt

Minimum Order Quantity: 5

Minimum	Maximum	1 color	2 color	3 color
---------	---------	---------	---------	---------

Minimum	Maximum	1 color	2 color	3 color
5	19	\$12.00	\$14.00	\$16.00
20	49	\$10.00	\$11.50	\$13.00
50	74	\$8.00	\$9.50	\$13.00
75	99	\$7.00	\$8.50	\$10.00
100	149	\$6.50	\$8.00	\$9.50
150	200	\$6.00	\$7.50	\$9.00

## About the printer



**Teeth Like Swords Printing**  
Specializing In Custom Small Run Prints. Please Contact Us For More Information.

No Info Provided

# EXHIBIT “R”





Heat Transfer	Discharge Printing
Screen Printing	
CUSTOM ARTWORK FEES	
\$40.00 / hour    *billed in 15 minute increments	

USAGE	METHOD
Other	Digital Printing

Paper Root always comes thru on time, with the newest technology to make the highest quality products.



[View Review Details >](#)

Was this review helpful?

Yes

No

Needed Shirts Fast

★★★★★ From Evan on Fri, July 5, 2019

USAGE	METHOD
Other	Screen Printing

I came to Greg within a week of me needing my shirts. He was very confident that he would be able to complete this task. The entire process was very professional, with some conversing about what I wanted to print on the shirts and the breakdown of sizes that wanted. The shirts were delivered on the date and time that Greg stated he could complete them by. I was amazed with the high quality results that I received in such a short time span. I am a very satisfied customer and will be returning to him for my future shirt needs.

[View Review Details >](#)

Was this review helpful?

Yes

No

Crazy soft prints and so fast!

★★★★★ From Jamie on Fri, July 5, 2019

USAGE	METHOD
Events	Screen Printing

We had a rush order for 100 tees, and we needed them by the weekend, this was a Tuesday. They helped us pick the perfect shirts and tweaked our design to make it printable. We recieved the shirts Friday of that same week and we were blown away by the quality. Paper Root has been our regular printer ever since, a real diamond in the rough. Love them!!!

[View Review Details >](#)

Was this review helpful?

Yes

No

Rad Clothing Locally

★★★★★ From Ryan on Fri, July 5, 2019

USAGE	METHOD
Other	Screen Printing, Direct to Garment

Paper Root Clothing has been making apparel for a while now here in St. Augustine and we always look to them when we need help with something or want to find a good fit. They source great materials, and are able to produce a wide variety of products.

[View Review Details >](#)

Was this review helpful?

Yes

No

★★★★★ From Tommy on Fri, July 5, 2019

<b>USAGE</b>	<b>METHOD</b>
Corporate	Heat Transfer, Screen Printing, Embroidery, Direct to Garment

Paper Root Printing has been my printer for years. They’ve always maintained their consistency, which is crucial for me when I reorder. The quality is always top notch, and I’ve never felt a need try any one else.

Was this review helpful?

Yes

No

[View Review Details >](#)

### Great Quality Shirts & Printing

★★★★★ From Ice on Fri, July 5, 2019

<b>USAGE</b>	<b>METHOD</b>
Corporate	Screen Printing

Paper Root has been printing the Ice Plant's shirts and other items for over 6 years. The quality and service has been exceptional. I highly recommend Paper Root for all you printing needs.

Was this review helpful?

Yes

No

[View Review Details >](#)

### Studio Director

★★★★★ From Gideon on Fri, July 5, 2019

<b>USAGE</b>	<b>METHOD</b>
Other	Screen Printing, Direct to Garment

The team at Paper Root have consistently come through for us on large and small orders – including a few rush orders! The print quality is top notch and I cannot recommend them enough.

Was this review helpful?

Yes

No

[View Review Details >](#)

### Fast quality service

★★★★★ From wyatt on Fri, July 5, 2019

<b>USAGE</b>	<b>METHOD</b>
Other	Heat Transfer, Screen Printing, Digital Printing

I’ve had a couple custom shirts made by the top quality and fast service nice shirts nice printing nice service all around good service from beginning to end

Was this review helpful?

Yes

No

[View Review Details >](#)

### Shirt Design

★★★★★ From Richie on Fri, July 5, 2019

<b>USAGE</b>	<b>METHOD</b>
Other	

Got mv shirts fast and on time. printing quality was excellent as

Was this review helpful?

Case ID: 9004

...very close to what I needed, printing quality was excellent as well nothing looked faded. I would recommend Paper Root to others.

Yes

No

[View Review Details >](#)

Great Work

★★★★★ From Jenn on Mon, July 15, 2019

USAGE  
Other

METHOD  
Screen Printing

Love Paper Root and the great work they do. Fast quotes, accurate proofs, speedy work and all around great customer service.

Was this review helpful?

Yes

No

[View Review Details >](#)

Ice Plant Vintage Bar and Dining printing

★★★★★ From Rich on Fri, July 5, 2019

USAGE  
Corporate

METHOD  
Screen Printing, Direct to Garment

Paper Root is our go to shop for t shirts, bags and kitchen attire. Also top quality on time work. I highly recommend

Was this review helpful?

Yes

No



[View Review Details >](#)

Pricing

Custom Artwork Fees: \$40.00 per hour, billed in 15 minute increments

Screen Printing

printing on a WHITE shirt

Minimum Order Quantity: 12

Minimum	Maximum	1 color	2 color	3 color	4 color	5 color	6 color
12	23	\$6.00	\$9.00	\$12.00	\$14.00	\$16.00	\$19.00
24	47	\$4.00	\$5.50	\$6.50	\$7.50	\$8.50	\$9.50
48	71	\$2.95	\$3.95	\$4.95	\$5.95	\$6.95	\$7.95
72	143	\$2.50	\$3.50	\$4.50	\$5.50	\$6.50	\$7.50
144	287	\$2.10	\$3.10	\$4.10	\$5.10	\$6.10	\$7.10
288	500	\$1.80	\$2.80	\$3.80	\$4.80	\$5.80	\$6.80

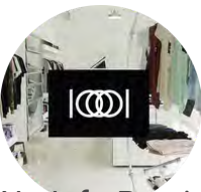
printing on a DARK shirt

Minimum Order Quantity: 12

Minimum	Maximum	1 color	2 color	3 color	4 color	5 color	6 color
---------	---------	---------	---------	---------	---------	---------	---------

Minimum 12	Maximum 23	1 color \$7.00	2 color \$10.00	3 color \$13.00	4 color \$15.00	5 color \$17.00	6 color \$20.00
24	47	\$5.00	\$6.50	\$7.50	\$8.50	\$9.50	\$10.50
48	71	\$3.95	\$4.95	\$5.95	\$6.95	\$7.95	\$8.95
72	143	\$3.50	\$4.50	\$5.50	\$6.50	\$7.50	\$8.50
144	287	\$3.10	\$4.10	\$5.10	\$6.10	\$7.10	\$8.10
288	500	\$2.80	\$3.80	\$4.80	\$5.80	\$6.80	\$7.80

## About the printer



No Info Provided

### Paper Root Printing Co

We Treat Every Shirt We Print Like It's Going To The Red Carpet!

# EXHIBIT “S”



jiffyshirts - Google Search

google.com/search?rlz=1C1CHBF\_enUS832US832&xsrf=ACYBGNRi0XND8likiri7bKoW-eqqaHOAMeA%3A1568912389242&ei=BbSDXaydDs...

Google

jiffyshirts

All

Shopping

Images

News

Maps

More

Settings

Tools

About 173,000 results (0.39 seconds)

JiffyShirts.com | T-Shirts For Cheap At \$1.75

Ad

www.jiffyshirts.com/Apparel/Online

We Offer Fashionable, Comfortable and High-Quality T-Shirts For Both Men and Women. Fast Delivery, Bulk Discounts, Always In Stock & Cheapest Prices. Buy Today. Ships today. Free shipping & Returns. Bulk discounts. Brands: Hanes, Gildan, Fruit Of The Loom.

Women's Shirts

137 Different Styles of Women's Shirts Available at Low Prices.

Men's Polos

Shop Popular Brands in a Variety of Sizes and Colors

Wholesale Blank Shirts - JiffyShirts.com

https://www.jiffyshirts.com

JiffyShirts.com has the lowest prices fastest delivery. Shop for cheap Blank Shirts, T-shirts, polo shirts, jackets, Tee Shirts, knit shirts, fleece pullovers, denim ...

Bella+Canvas

Ladies' Jersey Short-Sleeve Deep V-Neck T-Shirt. Bella+Canvas ...

Gildan

Top Seller; Sale. Adult Unisex Heavy Cotton™ 5.3 oz. T-Shirt ...

Blank T-Shirts

Gildan G500 Corn Silk - Gildan G640 Heather Berry - Sweatshirts

Kid's Shirts

Shop for cheap Blank Shirts, T-shirts, polo shirts, jackets, Tee ...

Women

JiffyShirts.com has the lowest prices fastest delivery. Shop for ...

Customer Service

Contact Us. We are proud to offer the finest selection of blank ...

More results from jiffyshirts.com »

JiffyShirts Jobs with Remote, Part-Time or Freelance Options ...

https://www.flexjobs.com › jobs › telecommuting-jobs-at-jiffyshirts

Check out great remote, part-time, freelance, and other flexible jobs with JiffyShirts! ...

JiffyShirts offers wholesale prices on t-shirts, sweatshirts, polos, hats, jackets, dress shirts,

Case ID: 190509004

cheapest apparel - Google Search

google.com/search?rlz=1C1CHBF\_enUS832US832&usxrf=ACYBGNSGq2uaHVqVNQp1XSQ5s1ZC2sTFXA%3A1568912413658&ei=HbSDXa\_kj...

Google

cheapest apparel

AllShoppingNewsImagesMapsMoreSettingsTools

About 46,400,000 results (0.57 seconds)

Shop Cheap Clothes | From \$6, Free Shipping

us.shein.com/

Discover Affordable Women **Clothes** Available In Various Colors, Styles and Sizes Online. Free return & free shipping on women's **clothing** at SHEIN.Up to 85% Off, Shop Now. Free Return.

Fashion Women Clothing

Get the latest styles

Up to 85% off, free return

Latest Women's Looks

600+ new Items launch everyday

Fantastic Quality & Style

Blair™ Clothing Catalog | 30% Off Highest Priced Item | blair.com

www.blair.com/

Take 30% Off Your Highest Priced Item & Get Free Shipping With Code B3GHQ! Ends 9/21.

JiffyShirts.com | Discount Apparel At \$1.61

www.jiffyshirts.com/Apparel/Online

Fast Delivery, Bulk Discounts, Always In Stock & **Cheapest** Prices. Buy Today. We Offer...

ROMWE Official Site Online | Fast Delivery & Big Discount

us.romwe.com/

Types: T-shirts, Dresses, Sweaters, Sweatshirts, Swimwear, Bottoms, Mens. Free Shipping...

15 Cheap Clothing Websites to Shop on a Budget - Cheap ...


https://www.cosmopolitan.com › style-beauty › fashion › cheap-clothing-f...

Apr 19, 2019 - If you love shopping for new **clothes** but hate looking at your bank account balance after, I have news for you: There are so many websites out ...

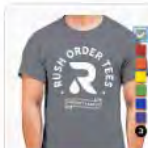
People also ask

What is the cheapest brand of clothes?


See cheapest...




Hooded Sweatshirt...  
\$7.96  
BulkApparel.com




Gildan Adult Ultra Cotton...  
\$2.96  
RushOrderTees  
Free shipping




Gildan Ultra Cotton T-shirt ...  
\$3.83  
Custom Ink  
★★★★★ (368)



Cheapest Custom T-Shirts  
\$2.95  
AlliedShirts.com  
★★★★★ (455)



Ditsy Print Smock Cami...  
\$8.95  
ROMWE



Leopard Print Legging...  
\$5.00  
SHEIN


Case ID: 190509004




About 52,400 results (0.41 seconds)

See jiffy shirts gildan hoodie


Sponsored




Hooded Sweatshirt...  
\$7.96  
BulkApparel.com




Hoodies wholesale  
\$7.96  
BulkApparel.com



Gildan 18500 - Heavy Blend...  
\$10.68  
Wordans.com  
★★★★★ (326)



Gildan Adult Heavy Blend 8...  
\$12.14  
ShirtSpace  
★★★★★ (326)



Gildan Midweight...  
\$16.62  
Custom Ink  
★★★★★ (326)

Jiffy Shirts - Official Site | No Hassle Bulk Discounts

Ad [www.jiffyshirts.com/](http://www.jiffyshirts.com/)

We Have The Lowest Prices And The Fastest Delivery. Bulk Discounts Start At \$89. Orders...

Gildan T-shirts \$1.45 in Bulk | Gildan Apparel Wholesale

Ad [www.bulkapparel.com/](http://www.bulkapparel.com/)

Gildan Blank T-shirt wholesaler from \$1.45 Gildan Sweatshirts Hoodies all colors & sizes

Gildan G185 Adult Heavy Blend™ 8 oz., 50/50 ... - Jiffy Shirts

<https://www.jiffyshirts.com/gildan-G185>

★★★★★ Rating: 4.8 - 3,908 reviews - \$12.11 to \$17.06 - In stock

Adult Unisex Heavy Blend™ 8 oz., 50/50 Hood. Gildan. Style : G185. Rating : ..... Recently however, I've noticed that all these hoodies are pilling. I'm not sure if ...

Color: \$12.11 Gray: \$11.96 White: \$10.37

JiffyShirts.com: Brand is Gildan

<https://www.jiffyshirts.com/brand=Gildan>

# EXHIBIT “T”

Review Summary

★★★★★

4.8 out of 5 stars

5 stars

0%

83%4 stars

13%3 stars

2%2 stars

0%1 star

17,407

reviews

98%

recommended

Fit

Too loose

As expected

Too tight

Shrinkage

Less

As expected

More

Customization

70% Heat transfer  
14% Keep it blank  
10% Screen printing  
2% Embroidery  
3% Other

Primary Usage

56% Personal use  
13% Events  
5% School  
5% Team  
3% Uniform  
19% Other

Product softness

Very soft

Average

Rough

Material Quality

Excellent

As expected

Poor

Product Durability

Excellent

As expected

Poor

Value for money

Great

Fine

Poor

Customer Reviews

Nice

★★★★★


from Keonna on Tue, Mar. 27, 2018

4.8★★★★★

Google

Customer Reviews

Case ID: 190509004

 128 orders  
33 reviews


Nice fit

Was this review helpful?

Once again... I am happy!



from Rikki on Fri, Mar. 23, 2018

 29 orders  
24 reviews

Love it!


Was this review helpful?

[View review details](#)

Great product



from Gwendolyn on Sat, Mar. 17, 2018

 1 order  
2 reviews

Printing


Was this review helpful?

[View review details](#)

Great shirts!



from Heather on Mon, Mar. 12, 2018

 92 orders  
67 reviews

Love!!!!


Was this review helpful?

[View review details](#)

Perfect



from Brittany on Tue, Mar. 6, 2018

 86 orders  
37 reviews

awesome!

Was this review helpful?

[View review details](#)

Great product




from Robert on Thu, Mar. 1, 2018

4.8 ★★★★★  
Google

Customer Reviews

Case ID: 190509004

 57 orders  
87 reviews

good fit


Was this review helpful?

[View review details](#)

Grey



from Danielle on Sat, Jan. 27, 2018

 16 orders  
7 reviews


Loved it

Was this review helpful?

Great T shirt



from Kelly on Sun, Jan. 14, 2018

 246 orders  
98 reviews

runs big


Was this review helpful?

[View review details](#)

Love the graphite heather!



from Dakota on Mon, Jan. 8, 2018

 47 orders  
19 reviews


Perfect!

Was this review helpful?

Fast shipping



from Ashley on Thu, Jan. 4, 2018

 194 orders  
2 reviews

Love it!


Was this review helpful?

[View review details](#)

Good tee



from Roberto on Wed, Dec. 27, 2017

 68 orders  
38 reviews

4.8   
Google

Customer Reviews

Case ID: 190509004

good tee

Was this review helpful?

[View review details](#)

Great



from Andrea on Fri, Dec. 15, 2017

79 orders  
45 reviews

Love it!

Was this review helpful?

[View review details](#)

T-shirt



from Luz on Wed, Nov. 22, 2017

29 orders  
17 reviews

Good buy

Was this review helpful?

[View review details](#)

Good



from Jennifer on Thu, Nov. 16, 2017

63 orders  
38 reviews

Good fit

Was this review helpful?

[View review details](#)

Awesome!



from Deborah on Tue, Oct. 24, 2017

194 orders  
189 reviews

Awesome!


Was this review helpful?

[View review details](#)

Good colors



from Tanesha on Mon, Oct. 23, 2017

 33 orders  
48 reviews

### GOOD FIT


Was this review helpful?

[View review details](#)

### Awesome



from Eboney on Sat, Sep. 23, 2017

 167 orders  
91 reviews

### Loved it


Was this review helpful?

[View review details](#)

### DI;/c ,.cx



from Tynesha on Wed, Sep. 13, 2017

 174 orders  
69 reviews

### fksx; x;


Was this review helpful?

[View review details](#)

### Great products



from Deanthony on Mon, Sep. 11, 2017

 53 orders  
84 reviews


### Flawless

Was this review helpful?

### GREAT BRAND



from Rondanika on Mon, Aug. 28, 2017

 185 orders  
114 reviews


### favorite

Was this review helpful?

### Stack or starve



from Dominic on Sat, Aug. 19, 2017

 6 orders  
1 review

4.8 ★★★★★  
Google

Customer Reviews

Case ID: 190509004

## Business

Was this review helpful?

[View review details](#)

## Great Tee!



from Amanda on Fri, Aug. 11, 2017

77 orders  
75 reviews

## Perfect!

Was this review helpful?

[View review details](#)

## Perfect



from Terra on Mon, July 31, 2017

92 orders  
1 review

## Perfect

Was this review helpful?

[View review details](#)

## Tshirt



from Taylor on Sun, June 25, 2017

113 orders  
70 reviews

## Good fit

Was this review helpful?

[View review details](#)

## Tshirt



from Taylor on Sun, June 11, 2017

113 orders  
70 reviews

## Good fit

Was this review helpful?

[View review details](#)

## Durable




from Terrance on Mon, May 15, 2017

4.8 ★★★★★  
Google

Customer Reviews

Case ID: 190509004



 243 orders  
86 reviews

### Quality


Was this review helpful?

 [View review details](#)

### Quality tee



from Angela on Fri, May 12, 2017

 219 orders  
152 reviews

### good tee


Was this review helpful?

 [View review details](#)

### Awesome



from Stephanie on Fri, Apr. 28, 2017

 70 orders  
16 reviews

### Awesome


Was this review helpful?

 [View review details](#)

### Satisfied customer



from Shataundia on Tue, Apr. 25, 2017

 1 order  
1 review

### Perfect


Was this review helpful?

 [View review details](#)

### Awesome!



from Deborah on Mon, Apr. 24, 2017

 194 orders  
189 reviews

### Awesome!

Was this review helpful?

 [View review details](#)

### Navy tee




4.8 ★★★★★  
Google

Customer Reviews

Case ID: 190509004

from Jeniffer on Mon, Apr. 17, 2017

 8 orders  
6 reviews

Navy tee


Was this review helpful?

 [View review details](#)

Awesome!



from Deborah on Mon, Apr. 10, 2017

 194 orders  
189 reviews

Awesome!


Was this review helpful?

 [View review details](#)

Awesome



from Deborah on Mon, Mar. 27, 2017

 194 orders  
189 reviews

Awesome


Was this review helpful?

 [View review details](#)

Loving it



from Conkichi on Tue, Mar. 21, 2017

 41 orders  
7 reviews

Love it


Was this review helpful?

 [View review details](#)

Great TEE



from Jessica on Mon, Mar. 13, 2017

 54 orders  
26 reviews

BEST TEE


Was this review helpful?

 [View review details](#)

Awesome!



from Deborah on Thu, Mar. 9, 2017

 194 orders  
189 reviews


Awesome!

Was this review helpful?  [View review details](#)

Great



from Melanie on Fri, Feb. 10, 2017

 54 orders  
32 reviews


monogram

Was this review helpful?  

Great



from Melanie on Fri, Feb. 10, 2017

 54 orders  
32 reviews


monogram

Was this review helpful?  

Awesome!



from Deborah on Mon, Feb. 6, 2017

 194 orders  
189 reviews


Awesome!

Was this review helpful?  [View review details](#)

Great quality



from Kathryn on Fri, Feb. 3, 2017

 20 orders  
1 review

Perfect!

Was this review helpful?  [View review details](#)

Heavy Cotton™ 5.3 oz. T-Shirt G500




from Sandee on Fri, Dec. 30, 2016

4.8 ★★★★★  
Google

Customer Reviews

Case ID: 190509004

 2 orders  
5 reviews

## Business


Was this review helpful?

 [View review details](#)

## Awesome!



from Deborah on Thu, Dec. 29, 2016

 194 orders  
189 reviews

## Awesome!


Was this review helpful?

 [View review details](#)

## Awesome!



from Deborah on Tue, Dec. 27, 2016

 194 orders  
189 reviews

## Awesome!

Was this review helpful?

 [View review details](#)

## Excellent



from Marlon on Tue, Dec. 20, 2016

 8 orders  
1 review

## Work use


Was this review helpful?

 [View review details](#)

## Tees



from Helen on Thu, Oct. 27, 2016

 59 orders  
15 reviews

## Good!!!!

Was this review helpful?

 [View review details](#)

## Tshirt




4.8 ★★★★★  
Google

Customer Reviews

Case ID: 190509004

from Cynthia on Thu, Oct. 20, 2016

 9 orders  
2 reviews

love it


Was this review helpful?

 [View review details](#)

Awesome!

☆☆☆☆☆

from Dale on Wed, Nov. 23, 2011

 1 order  
1 review


Awesome!

Was this review helpful?

Great!!!

★★★★★

from Rita on Wed, Nov. 23, 2011

 1 order  
1 review


great!!!

Was this review helpful?

Loved it

★★★★★

from Sandra on Wed, Nov. 23, 2011

 1 order  
1 review


Loved it

Was this review helpful?

All good

★★★★★

from Derick on Sun, June 6, 2010

 1 order  
1 review

all good

Was this review helpful?

# EXHIBIT “U”

Review Summary

★★★★★

4.8 out of 5 stars

5 stars

0%

83%4 stars

13%3 stars

2%2 stars

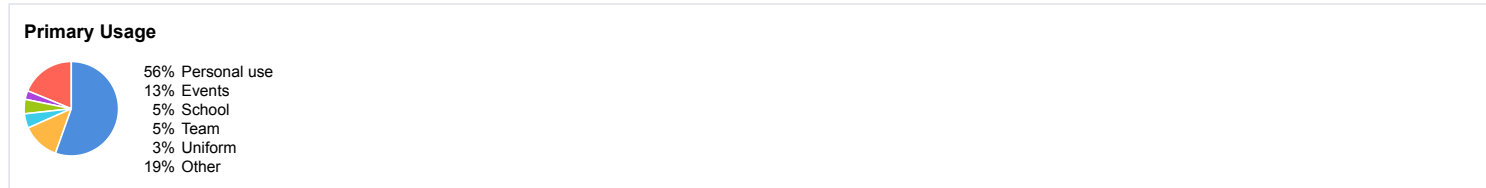
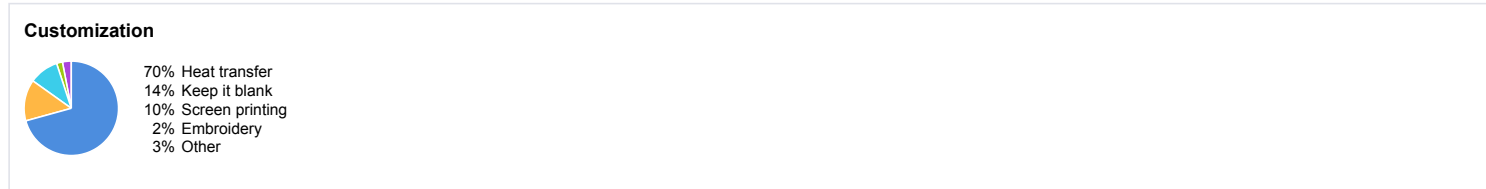
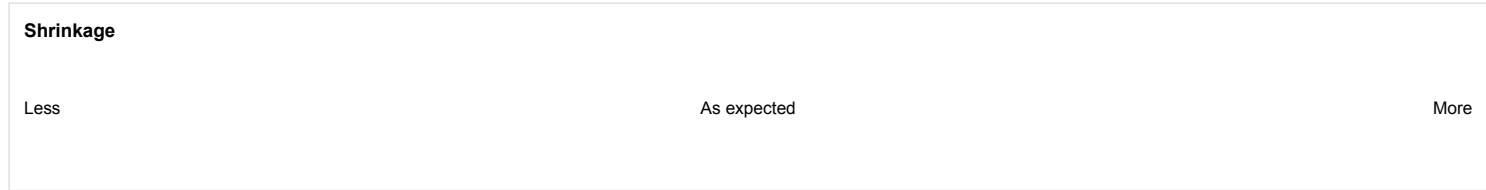
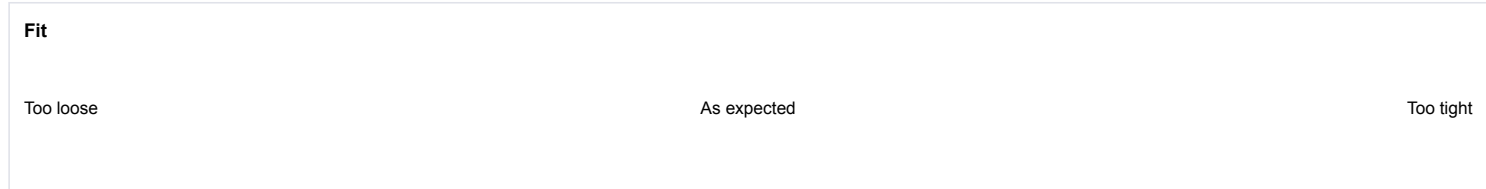
0%1 star

17,407

reviews

98%

recommended



Product softness

Very soft

Average

Rough

Material Quality

Excellent

As expected

Poor

Product Durability

Excellent

As expected

Poor

Value for money

Great

Fine

Poor

Customer Reviews

Love the shirt

★★★★★


from Stacy on Thu, Apr. 20, 2017

4.8★★★★★

Google

Customer Reviews

Case ID: 190509004

 1 order  
8 reviews

Leisure


Was this review helpful?

 [View review details](#)

Awesome



from Deborah on Wed, Apr. 19, 2017

 194 orders  
189 reviews

Awesome


Was this review helpful?

 [View review details](#)

Awesome



from Deborah on Mon, Apr. 17, 2017

 194 orders  
189 reviews

Awesome


Was this review helpful?

 [View review details](#)

Tshirt



from Monica on Sat, Apr. 15, 2017

 82 orders  
24 reviews

Perfect


Was this review helpful?

 [View review details](#)

Love it!



from Chandra on Fri, Apr. 14, 2017

 109 orders  
12 reviews

Love it

Was this review helpful?

 [View review details](#)

Durable




4.8 ★★★★★  
Google

Customer Reviews

Case ID: 190509004



from Ardeart on Mon, Apr. 10, 2017

 243 orders  
86 reviews

### Quality


Was this review helpful?

 [View review details](#)

### Awesome



from Deborah on Thu, Apr. 6, 2017

 194 orders  
189 reviews

### Awesome


Was this review helpful?

 [View review details](#)

### Great!



from Tonya on Wed, Apr. 5, 2017

 1 order  
2 reviews

### I love!


Was this review helpful?

 [View review details](#)

### Awesome



from Deborah on Tue, Apr. 4, 2017

 194 orders  
189 reviews

### Awesome


Was this review helpful?

 [View review details](#)

### AMAZING!



from Jessica on Tue, Apr. 4, 2017

 6 orders  
7 reviews

### Awesome

Was this review helpful?

 [View review details](#)

### Awesome


4.8 ★★★★★  
Google

Customer Reviews

Case ID: 190509004



from Deborah on Thu, Mar. 30, 2017

 194 orders  
189 reviews


Awesome

Was this review helpful?   [View review details](#)

Awesome



from Deborah on Fri, Mar. 24, 2017

 194 orders  
189 reviews


Awesome

Was this review helpful?   [View review details](#)

Awesome



from Deborah on Sun, Mar. 19, 2017

 194 orders  
189 reviews


Awesome

Was this review helpful?   [View review details](#)

Excellent



from Ardeart on Wed, Mar. 8, 2017

 243 orders  
86 reviews


Quality

Was this review helpful?   [View review details](#)

Loved i!



from Ashley on Wed, Mar. 8, 2017

 63 orders  
47 reviews

love it

Was this review helpful?   [View review details](#)4.8 ★★★★★  
Google


Customer Reviews

Case ID: 190509004

Awesome



from Deborah on Mon, Mar. 6, 2017

 194 orders  
189 reviews

Awesome


Was this review helpful?

[View review details](#)

Nice



from Ardeart on Wed, Mar. 1, 2017

 243 orders  
86 reviews

Quality


Was this review helpful?

[View review details](#)

Repeat customer



from Termica on Sun, Feb. 26, 2017

 5 orders  
5 reviews

Love it


Was this review helpful?

[View review details](#)

Awesome



from Deborah on Thu, Feb. 23, 2017

 194 orders  
189 reviews

Awesome


Was this review helpful?

[View review details](#)

Awesome



from Deborah on Wed, Feb. 15, 2017

 194 orders  
189 reviews

Awesome

Was this review helpful?

[View review details](#)

Fast shipping. Great quality



from Camica on Sun, Jan. 29, 2017



146 orders

25 reviews

Love it

Was this review helpful?

Yes

No

[View review details](#)

AWESOME



from Deborah on Thu, Jan. 12, 2017



194 orders

189 reviews

aWESOME

Was this review helpful?

Yes

No

[View review details](#)

Awesome



from Deborah on Mon, Jan. 2, 2017



194 orders

189 reviews

Awesome

Was this review helpful?

Yes

No

[View review details](#)

Red



from Rebekah on Sun, Dec. 18, 2016



6 orders

3 reviews

Awesome

Was this review helpful?

Yes

No

[View review details](#)

Red



from Rebekah on Sun, Dec. 18, 2016



6 orders

3 reviews

Awesome

Was this review helpful?

Yes

No

[View review details](#)

4.8 ★★★★★

Google

Customer Reviews

Case ID: 190509004

Quality



from Ardeart on Tue, Nov. 8, 2016

243 orders  
86 reviews

Quality

Was this review helpful? 

Yes

No

[View review details](#)

Love this!!!



from Gabrielle on Mon, Oct. 24, 2016

37 orders  
6 reviews

Love it

Was this review helpful? 

Yes

No

[View review details](#)

Useful



from Pedro on Thu, Oct. 20, 2016

25 orders  
18 reviews

Good 😊

Was this review helpful? 

Yes

No

[View review details](#)

Awesome



from Wallace on Mon, Dec. 19, 2011

1 order  
1 review

awesome

Was this review helpful? 

Yes

No

Love it



from Mica on Sun, Jan. 11, 2009

1 order  
1 review

Love it

Was this review helpful? 

Yes

No

Perfect




4.8

Google

Customer Reviews

Case ID: 190509004

from Dick on Tue, Nov. 25, 2008

 1 order  
1 review


Perfect

Was this review helpful?

Longer.



from Abbi on Fri, Nov. 21, 2008

 1 order  
1 review


Longer.

Was this review helpful?

Satisfied



from Lateia on Fri, Apr. 12, 2019

 11 orders  
1 review




Was this review helpful?

[View review details](#)

Awesome



from Patricia on Wed, Jan. 30, 2019

 6 orders  
1 review

Awesoy


Was this review helpful?

[View review details](#)

Happy



from Naomi on Sat, Nov. 3, 2018

 14 orders  
4 reviews

Great!


Was this review helpful?

[View review details](#)

Love



from Shaiha on Thu, Nov. 1, 2018

 20 orders  
8 reviews

4.8 

Google

Customer Reviews

Case ID: 190509004

Huhjjj




Was this review helpful?

[View review details](#)

Great



from Luz on Sat, Aug. 25, 2018

 5 orders  
1 review

Great!


Was this review helpful?

[View review details](#)

Great value!



from Nicole on Wed, July 25, 2018

 121 orders  
93 reviews

Great!


Was this review helpful?

[View review details](#)

Nice



from Ricardo on Wed, June 20, 2018

 14 orders  
13 reviews

thanks


Was this review helpful?

[View review details](#)

Great value!



from Nicole on Mon, May 7, 2018

 121 orders  
93 reviews

Great!


Was this review helpful?

[View review details](#)

Gildan shirts



from Paula on Sun, Apr. 1, 2018

 38 orders  
14 reviews


I have

Was this review helpful?  [View review details](#)

## Sport Grey



from Brandy on Tue, Mar. 20, 2018

 90 orders  
35 reviews


Custom

Was this review helpful?  [View review details](#)

## Great!



from Taylor on Wed, Feb. 21, 2018

 10 orders  
7 reviews


Great!

Was this review helpful?  [View review details](#)

## Excellent shirts



from Casi on Wed, Feb. 14, 2018

 1 order  
3 reviews


Great!

Was this review helpful?  [View review details](#)

## Nice affordable shirt.



from Rebecca on Sat, Jan. 6, 2018

 7 orders  
7 reviews

Great!

Was this review helpful?  

Great

4.8 ★★★★★  
Google


Customer Reviews

Case ID: 190509004





from Katie on Fri, Dec. 1, 2017

 16 orders  
12 reviews

Great!


Was this review helpful? Yes No

[View review details](#)

Shirts



from Lauren on Sun, Oct. 8, 2017

 11 orders  
12 reviews

Lovely


Was this review helpful? Yes No

[View review details](#)

Jnj , ,



from Tynesha on Fri, Sep. 29, 2017

 174 orders  
69 reviews

Inlkl


Was this review helpful? Yes No

[View review details](#)

Great!



from Maria on Mon, Sep. 4, 2017

 86 orders  
164 reviews


Great!

Was this review helpful? Yes No

Men's shirt



from Grenisha on Fri, Aug. 11, 2017

 11 orders  
3 reviews

Great!

Was this review helpful? Yes No

[View review details](#)



# **Exhibit C**

**FILED**  
01 NOV 2019 09:25 am  
**Civil Administration**  
C. KEENAN

**DOCKETED**  
JAN 15 2020  
R. POSTELL  
**COMMERCE PROGRAM**

**PRINTFLY CORPORATION**  
**d/b/a RushOrderTees.com**  
2727 Commerce Way  
Philadelphia, PA 19154

*Plaintiff*

v.

**DEKEO INC. d/b/a JiffyShirts.com**  
1000 N. West Street, Suite 1200  
Wilmington, DE 19801

*Defendant*

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY,  
PENNSYLVANIA

No. 190509004

**COMMERCE PROGRAM**

**NON-JURY**

**ORDER**

AND NOW, on this <sup>12</sup>15 day of January, <sup>2020</sup>~~2019~~, upon consideration of Plaintiff's Motion for Leave to File Amended Complaint, any opposition thereto, it is hereby **ORDERED** that said Motion is **GRANTED** and Plaintiff is granted leave to file the Amended Complaint attached to Plaintiff's Motion as Exhibit "1" (including the exhibits that were omitted for the purpose of this Motion and for brevity).

**BY THE COURT:**

  
J.

Printfly Corp Vs Deekeo-ORDER



19050900400024

Case ID: 190509004  
Control No.: 19110063

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been filed electronically. Notice of this filing will be sent to parties registered with the Court's electronic filing system and is accessible through the Court's electronic filing system.

The undersigned further certifies that a copy of the foregoing will be served on the following parties via First Class Mail on today's date as follows:

Gavin P. Lentz, Esquire  
Anton Kaminsky, Esquire  
BOCHETTO & LENTZ, P.C.  
1524 Locust Street  
Philadelphia, PA 19102

*Attorneys for Plaintiff*

/s/ Larry M. Keller

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Philadelphia, PA 19107  
(215) 574-0600  
lmk@sidkoffpincusgreen.com

Dated: February 10, 2020

*Attorney for Defendants*